# **EXHIBIT A**

## Rachlis Duff & Peel, LLC Rates

Professional/	Position	2020	2020
Paraprofessional		Standard	Discounted
		<b>Hourly Rates</b>	<b>Hourly Rates</b>
Michael Rachlis	RDP Member	\$575	\$390
Drew G.A. Peel	RDP Member	\$575	\$390
Ellen Duff	RDP Of Counsel	\$575	\$390
Andrew E. Porter	RDP Of Counsel	\$575	\$390
Jodi Rosen Wine	RDP Of Counsel	\$575	\$260
Kathleen Pritchard	RDP Paralegal	\$195	\$140
Ania Watychowicz	RDP Paralegal	\$195	\$140
Justyna Rak	RDP Paralegal	\$195	\$140
Stoja Zjalic	RDP Legal Assistant	\$160	\$110
Julia Porter	RDP Legal Assistant	\$140	\$95

BrookWeiner Billing Rates

20% discount from current standard rates

Staff Accountant\$110/hourManager\$210/hourPartner\$275/hour

# Miller Kaplan Arase LLP Schedule of Fees- Standard and Discounted Rates

Name Rate	Per Hour Standard	Discounted 80%	<u>Title</u>
Jude Damasco	\$ 550.00	\$ 440.00	Partner
Julia Damasco	\$ 550.00	\$ 440.00	Partner
John Mandeville	\$ 265.00	\$ 212.00	Senior Acct.
John Mandeville	\$ 270.00	\$ 216.00 (rate in	crease Dec. 2020)
Jessica Corbin	\$ 210.00	\$ 168.00	Acct. Staff
Jessica Corbin	\$ 225.00	\$ 180.00 (rate in	crease Dec. 2020)
Alla Maumus	\$ 175.00	\$ 140.00	Acct. Staff
Emily Ransom	\$ 200.00	\$ 160.00	Acct. Staff
Nicole Nelson	\$ 80.00	\$ 64.00	Acct. Staff
Cindy Allred	\$ 70.00	\$ 56.00	Acct. Staff

## Axos Financial Services

Professional	Position	<b>Hourly Rates</b>
Gena Sullivan	Project Manager	\$80.00
Cl. 1 D. 1	I/D/D	¢100.00
Cheryl Bender	IT/Programming	\$100.00
Tracey McMahan	Data Entry	\$45.00
Joanna Croney	Data Entry	\$45.00

## Prometheum's Hourly Rate

Position	<b>Hourly Rate</b>		
Senior Technical Consultant	\$110		

# **EXHIBIT B**

## Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 8 of 182 PageID #:20277

Interim Fee Application	Docket No. Application	Date Filed	Amount of Application	<u>of</u> on	Docket No. Order	Date of Order	Amount	t Approved	Amount F		Amo	proved ount Unpaid of 9/30/20)
First (3d Q 2018)	411	June 12, 2019	\$	413,298.44	546	October 15, 2019	\$	413,298.44	\$ 4	13,298.44	\$	-
Second (4th Q 2018)	487	August 21, 2019	\$	553,968.43	547	October 15, 2019	\$	553,968.43	\$ 5	553,968.43	\$	-
Third (1st Q 2019)	569	November 1, 2019	\$	547,711.44	614	January 7, 2020	\$	547,711.44	\$ 5	547,711.44	\$	-
Fourth (2d Q 2019)	576	November 15, 2019	\$	499,214.42	614	January 7, 2020	\$	499,214.42	\$	23,008.66	\$	476,205.76
Fifth (3d Q 2019)	608	December 20, 2019	\$	485,094.92	710	June 9, 2020	\$	485,094.92	\$	5,290.00	\$	479,804.92
Sixth (4th Q 2019)	626	February 14, 2020	\$	297,791.41	710	June 9, 2020	\$	297,791.41	\$	3,965.00	\$	293,826.41
Seventh (1st Q 2020)	755	July 28, 2020	\$	362,102.16	824	October 26, 2020	\$	362,102.16		n/a	\$	362,102.16
Eighth (2d Q 2020)	778	August 28, 2020	\$	451,944.97	824	October 25, 2020	\$	451,944.97		n/a	\$	451,944.97
Ninth (3d Q 2020)	885	November 30, 2020	\$	403,064.48	n/a	n/a		n/a		n/a		
											\$	2,063,884.22

# **EXHIBIT C**

# STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 10/1/2020 to 12/31/2020

i unu ACCOU	nting (See Instructions):	<u> </u>	6.1	O 17 : 1
l <sub>-</sub>		<u>Detail</u>	Subtotal	Grand Total
Line 1	Beginning Balance (As of 10/1/2020):	\$1,167,227.32		\$1,167,227.32
	Increases in Fund Balance:			
Line 2	Business Income			
Line 3	Cash and unliquidated assets			
Line 4	Interest/Dividend Income	\$758.19		
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation			
Line 7	Net Income from Properties			
Line 8	Miscellaneous - Other <sup>1</sup>	\$148,302.95		
	Total Funds Available (Line 1-8):			\$1,316,288.46
	Decrease in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for receivership operations			
Line 10a	Disbursements to receiver or Other Profesionals			
Line 10b	Business Asset Expenses <sup>2</sup>	(\$134,407.03)		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses		\$0.00	
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		(\$134,407.03)	
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses		\$0.00	
Line 11b	Distribution Plan Implementation Expenses:		70.00	
C 11D	1. Fees:			
	1. Fees: Fund Administrator			
l	IDC	•		

# STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 10/1/2020 to 12/31/2020

	Distribution Agent			
	Consultants			
	Legal Advisers	•		
	Tax Advisers	••		
	2. Administrative Expenses			
	3. Investor identification			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Adminstrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursement for Distribution Expenses Paid by the	e Fund	\$0.00	
Line 12	Disbursement to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursement to Court/Others:			
	Total Funds Disbursed (Lines 1-12):			(\$134,407.03)
Line 13	Ending Balance (As of 12/31/2020):			\$1,181,881.43
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents			\$1,181,881.43
Line 14b	Investments (unliquidated Huber/Hubadex investments)			
Line 14c	Other Assets or uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$1,181,881.43

Receiver:		
	/s/ Kevin B. Duff	

reguna of insurance premium financing payments for sola propert7 (6751 S Merrill) - \$240.00; funds transfers from property accounts per 10/30/20 Order (#843) on 2d restoration motion - \$148,062.95; TOTAL: \$148,302.95

Insurance (\$96,968.83); property utilities (\$11,023.69); property security installations (\$4,591.08); property repairs (\$10,076.68): property management fees (\$2,003.00); payment of retained professional fees for 1Q and 2Q2020 per 10/26/20 Order (#824); (\$9,743.75); TOTAL \$134,407.03.

### Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 12 of 182 PageID #:20281

STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis
Receivership; Civil Court Docket No. 18-cv-05587
Reporting Period 10/1/2020 to 12/31/2020

(Signature)

Kevin B. Duff, Receiver EquityBuild, Inc., et al.					
(Print	ed Name)				
	January 26, 2021				

# **EXHIBIT D**

#### **Master Asset List**

Receiver's Account (as of 12/31/2020)						
Institution Account Information Amount						
AXOS Fiduciary Services	Checking #0181	\$1,055,148.26				
AXOS Fiduciary Services	Checking #0348	\$126,733.17				
		Total:				
		\$1,181,881.43				

	Receivership Defendants' Accounts					
Institution	Account Information	Current Value	Amount Transferred to Receiver's Account			
Wells Fargo	Checking (53 accounts in the names of the affiliates and affiliate entities included as Receivership Defendants)		\$190,184.131			
Wells Fargo	Checking (account in the names of Shaun Cohen and spouse)		\$23,065.432			
Byline Bank	Checking (2 accounts in names of Receivership Defendants)	\$21,828.733				
			Total:			
			\$213,249.56			

#### **EquityBuild Real Estate Portfolio**

For a list of the properties within the EquityBuild portfolio identified by property address, alternative address (where appropriate), number of units, and owner, *see* Exhibit 1 to the Receiver's First Status Report, Docket No. 107. See also Exhibit E hereto.

Other, Non-Illinois Real Estate				
Description	Appraised Market Value			
Single family home in Plano, Texas	±\$450,000.00			
	Approximate mortgage amount: \$400,000.00 Approximate value less mortgage: \$50,000.00			

<sup>&</sup>lt;sup>1</sup> This amount reflects the total value of all of the frozen bank accounts held by Wells Fargo that were transferred to the Receiver's account; the final transfer was made on 1/22/20, and included as part of the Receiver's Account as of 3/31/20.

<sup>&</sup>lt;sup>2</sup> This amount was transferred to the Receiver's Account as of 8/27/18, and is included as part of the total balance of the Receiver's Account as of 3/31/19.

<sup>&</sup>lt;sup>3</sup> The Receiver is investigating whether these accounts are properly included within the Receivership Estate.

# **EXHIBIT E**

#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

#### Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0025	7301 S Stewart Ave	\$302,674.81	11/4/2019	Interest earned, \$190.15
0033	5001-05 S Drexel	\$2,719,323.46	5/22/2019	Interest earned, \$1,708.33
0041	7927-49 S Essex	\$642,868.78	5/1/2019	Interest earned, \$403.86
0058	8100-14 S Essex	\$926,599.60	4/30/2019	Interest earned, \$582.10
0066	6160-6212 S King	\$428,856.60	4/30/2019	Interest earned, \$269.41
0108	8047 S. Manistee	\$806,947.63	2/5/2020	Interest earned, \$506.93
0116	5955 S. Sacramento	\$448,986.96	11/5/2019	Interest earned, \$282.06
0124	6001-05 S. Sacramento	\$327,036.56	11/5/2019	Interest earned, \$205.45
0132	7026-42 S. Cornell	\$865,975.06	11/6/2019	Interest earned, \$544.01
0157	7834-44 S. Ellis	\$1,632,532.19	11/4/2019	Interest earned, \$1,025.58
0165	701-13 S. 5th Avenue	\$597,747.79	3/31/2020	Refund from title company of unused escrow funds, \$142,798.11; interest earned, \$354.06
0199	7625 S. East End	\$1,238,662.35	12/20/2019	Interest earned, \$778.15
0207	7635 S. East End	\$1,046,270.38	12/20/2019	Interest earned, \$657.28
0215	7748 S. Essex	\$1,169,126.89	12/18/2019	Interest earned, \$734.46
0223	7750 S. Muskegon	\$408,538.52	12/18/2019	Interest earned, \$256.65
0231	7749-59 S. Yates	\$647,543.90	4/22/2020	Transfer to Receiver's account in accordance with Order (#843) on 2d restoration motion (\$139,383.80); interest earned, \$434.41
0249	7450 S. Luella	\$186,135.60	5/7/2020	Interest earned, \$116.93
0256	4520-26 S. Drexel	\$5,883,614.92	5/21/2020	Interest earned, \$3,696.18
0264	6749-59 S. Merrill	\$1,398,209.10	4/28/2020	Interest earned, \$878.38
0272	7110 S. Cornell	\$1,146,680.00	8/13/2020	Interest earned, \$720.36
0298	7600 S. Kingston	\$1,377,480.29	12/3/2020	Proceeds from 12/3/20 sale of property,
0306	7656 S. Kingston	\$230,837.38	12/2/2020	\$1,377,207.46; interest earned, \$272.83 Proceeds from 12/2/20 sale of property, \$230,791.66; interest earned, \$45.72
0314	8201 S. Kingston	\$279,204.19	5/21/2020	Interest earned, \$175.40
0322	8326-58 S. Ellis	\$1,311,281.33	6/11/2020	Refund from title company of unused escrow funds, \$2,000.00; interest earned, \$823.47
0330	6949-59 S. Merrill	\$1,405,122.05		Proceeds from 12/1/20 sale of property, \$1,404,824.55; interest earned, \$297.50
0355 0363	7546 S. Saginaw 638 N. Avers	\$510,616.73 \$336,001.06		Interest earned, \$321.65 Insurance settlement for fire damage (additional amount) \$111,758.22; payment of property management expenses, (\$13,140.29); payment of commission to insurance broker (\$32,486.92); payment of fees to fire board-up service (\$11,139.00); interest earned, \$191.10
0371	5450 S. Indiana	\$1,650,075.30	6/25/2020	Transfer to Receiver's account in accordance with Order (#843) on 2d restoration motion (\$8,679.15); interest earned, \$1,041.16
0389	6437 S. Kenwood	\$1,317,233.21	6/25/2020	Interest earned, \$829.77
0397	7300 S. St. Lawrence	\$283,544.58	7/27/2020	Interest earned, \$178.62
0405	7760 S. Coles	\$120,606.44	6/26/2020	Interest earned, \$75.98
0413	8000 S. Justine	\$184,483.98	6/26/2020	Interest earned, \$116.21
0421	8107-09 S. Ellis	\$94,916.63	6/30/2020	Interest earned, \$59.80
0439	8209 S. Ellis	\$253,342.74	7/1/2020	Interest earned, \$159.59
0447	8214-16 S. Ingleside	\$204,692.87	6/30/2020	Interest earned, \$127.54
0454	11117 S. Longwood	\$1,589,102.58	7/8/2020	Interest earned, \$1,001.04
0462	1700 Juneway	\$2,629,327.52		Proceeds from 10/20/20 sale of property, \$2,628,031.19; interest earned, \$1,296.33
0470	1131-41 E. 79th	\$1,055,948.44	12/22/2020	Proceeds from 12/22/20 sale of property, \$1,055,876.12; interest earned, \$72.32
0488	2736 W. 64th	\$373,360.72	9/29/2020	Interest earned, \$235.19

## Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 17 of 182 PageID #:20286

#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

#### Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0496	3074 Cheltenham	\$1,012,831.26	9/24/2020	Post-sale reconciliation proceeds from property manager, \$51,828.28; interest earned, \$608.56
0504	5618 S. Martin Luther King	\$601,063.85	9/29/2020	Interest earned, \$378.64
0512	6250 S. Mozart	\$863,100.40		Proceeds from 12/22/20 sale of property, \$843,372.55; interest earned, \$70.16
0520	6355 S. Talman	\$472,440.40	9/29/2020	Interest earned, \$297.61
0538	6356 S. California	\$312,751.81		Interest earned, \$197.01
0546	6554-58 S. Vernon	\$528,947.39		Proceeds from 10/15/20 sale of property, \$528,668.50; interest, \$278.89
0553	7051 S. Bennett	\$483,127.84	9/23/2020	Interest earned, \$304.34
0561	7201 S. Constance	\$952,017.95		Interest earned, \$599.71
0579	7201-07 S. Dorchester	\$416,779.79		Proceeds from 10/20/20 sale of property, \$413,136.81; refund from title company of unused escrow funds, \$3,438.04; interest earned, \$204.94
0587	7508 S. Essex	\$691,115.13	10/28/2020	Proceeds from 10/28/20 sale of property, \$690,807.52; interest earned, \$307.61
0595	7957 S. Marquette	\$279,970.84	9/21/2020	Interest earned, \$176.36
0603	4533 S. Calumet	\$1,969,944.25		Proceeds from 12/1/20 sale of property, \$1,969,074.99; interest earned, \$418.42
0611	1017 W. 102nd	\$4,496.31	n/a	Interest earned, \$2.83
0629	1516 E. 85th	\$2,903.75		Interest earned, \$2.83
0637	417 Oglesby	\$369.96	·	Interest earned, \$0.23
0645	7922 S. Luella	\$200.67	•	Interest earned, \$0.13
0652	7925 S. Kingston	\$2,056.09	•	Interest earned, \$1.29
0660	8030 S. Marquette	\$1,414.11	•	Interest earned, \$0.89
0678	8104 S. Kingston	\$2,647.79	n/a	Interest earned, \$1.67
0686	8403 S. Aberdeen	\$2,354.58	n/a	Interest earned, \$1.48
0694	8405 S. Marquette	\$1,945.78	n/a	Interest earned, \$1.23
0702	8529 S. Rhodes	\$935.69	n/a	Interest earned, \$0.59
0710	9212 S. Parnell	\$2,461.76	n/a	Interest earned, \$1.55
0728	10012 S. LaSalle	\$2,024.92		Interest earned, \$1.27
0736	11318 S. Church	\$1,159.98	•	Interest earned, \$0.73
0744	6554 S. Rhodes	\$1,086.73	•	Interest earned, \$0.68
0751	6825 S. Indiana	\$1,054.11		Interest earned, \$0.66
0769	7210 S. Vernon	\$224.23	•	Interest earned, \$0.15
0777 0785	7712 S. Euclid	\$1,642.25 \$367.55	•	Interest earned, \$1.04
	8107 S. Kingston			Interest earned, \$0.23
0793 0801	8346 S. Constance 8432 S. Essex	\$1,471.84 \$393.52		Interest earned, \$0.92 Interest earned, \$0.25
0819	8517 S. Vernon	\$1,174.48	<u> </u>	Interest earned, \$0.74
0827	2129 W. 71st	\$1,002.69		Interest earned, \$0.63
0835	9610 S. Woodlawn	\$2,330.52		Interest earned, \$1.47
0843	1401 W. 109th	\$2,368.74		Interest earned, \$1.49
0850	1139 E. 79th	\$3,706.04	•	Interest earned, \$2.33
0868	4611 S. Drexel	\$43,820.47		Interest earned, \$27.61
0876	6217 S. Dorchester	\$12,826.65	•	Interest earned, \$8.08
0884	7255 S. Euclid	\$26,425.71	<u>.</u>	Interest earned, \$16.65
0892	7024 S. Paxton	\$45,157.36	n/a	Interest earned, \$28.45
0900	4317 S. Michigan	\$791,811.22	12/2/2020	Proceeds from 12/2//20 sale of property, \$787,969.95; interest earned, \$164.24
0918	7701 S. Essex	\$646,029.07	11/16/2020	Proceeds from 11/16/20 sale of property, \$641,060.09; interest earned, \$200.62
0926	816 E. Marquette	\$752,554.46	11/18/2020	Proceeds from 11/18/20 sale of property, \$747,245.26; interest earned, \$228.44
0934	1422 E. 68th	\$1,823.22	n/a	Interest earned, \$1.15
0942	2800 E. 81st	\$5,401.18		Interest earned, \$3.40

## Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 18 of 182 PageID #:20287

SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

#### Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0959	4750 S. Indiana	\$13,133.06	n/a	Interest earned, \$8.28
0967	7840 S. Yates	\$8,764.09	n/a	Interest earned, \$5.53
0975	7442-48 S. Calumet	\$518,720.74	11/16/2020	Proceeds from 11/16/20 sale of property,
				\$518,560.89; interest earned, \$159.85
0983	431 E. 42nd Place	\$59,398.89	11/5/2020	Proceeds from 11/5/20 sale of property, \$59,375.71;
				interest earned, \$23.18
	TOTAL FUNDS HELD:	\$49,583,260.26		

# **EXHIBIT F**

# Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 20 of 182 PageID #:20289 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 8, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621127

Legal Fees for the period October 2020 \$28,431.00

Expenses Disbursed \$0.00

Due this Invoice \$28,431.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Asset Disposition			
10/1/2020	KBD	1.20	Telephone conference with and draft correspondence to real estate broker and A. Porter regarding property sales and related issues (7201 Dorchester, 7237 Bennett) (.6); confer with M. Rachlis and J. Wine regarding same (7201 Dorchester, 7237 Bennett) (.1); exchange correspondence with J. Rak regarding post sale reconciliation (7110 Cornell) (.1); exchange correspondence with M. Rachlis regarding tenth sales motion (.2); exchange correspondence with J. Rak regarding purchaser's lender request for property access (2800-06 E. 81st) (.2).
			Asset Disposition
10/2/2020	KBD	1.20	Study and revise tenth sales motion.
			Asset Disposition
10/4/2020	KBD	0.50	Revise tenth motion to approve sales and exchange correspondence regarding same.
			Asset Disposition
10/5/2020	KBD	0.80	Review revised tenth motion to approve sales and exchange correspondence regarding filing of same (.5); draft correspondence to real estate broker regarding negotiation with potential buyer (1102 Bingham) (.1); review correspondence regarding lease units, sale, and closing (7201 Dorchester) (.2).
			Asset Disposition
10/6/2020	KBD	0.30	Telephone conference with A. Porter regarding closing on sale of property and water certificate and escrow issue (5618 King) and relating to efforts to resolve potential closing issue with another property and communications with purchaser and asset manager (7201 Dorchester) (.1); exchange correspondence with K. Pritchard and bank representatives regarding transfer of funds and telephone conference with bank representative regarding same (7201 Dorchester) (.2).
			Asset Disposition
10/7/2020	KBD	0.50	Work on tenth sales motion (.3); exchange correspondence with A. Porter regarding planning for additional sales (6558 South Vernon, 1700 West Juneway, 7201 South Dorchester, 7508 South Essex, 431 East 42nd Street, 7237 South Bennett, 638 North Avers, and 7109 South Calumet) (.2).
			Asset Disposition
10/12/2020	KBD	2.40	Confer with real estate broker, A. Porter, and M. Rachlis regarding efforts and planning to sell certain properties (7109 Calumet) (1.2), (638 Avers) (.3), (7237 Bennett) (.4), (7508 Essex) (.3); exchange correspondence with J. Wine and real estate broker regarding housing court action (7508 Essex) (.2).
			Asset Disposition

<u>Date Indiv</u> <u>H</u>	ours Description
10/13/2020 KBD	0.20 Attention to post-closing receipt and deposit of escrow funds (701 S. 5th).
	Asset Disposition
10/14/2020 KBD	0.80 Work on closing documents with J. Rak and A. Watychowicz (6558 S Vernon, 1700 S Juneway, 7201 S Dorchester, 7508 S. Essex).
	Asset Disposition
10/15/2020 KBD	0.80 Study purchase offer and exchange correspondence with real estate broker and A. Porter regarding same (1102 Bingham) (.3); telephone conference with J. Wine regarding property sale and related expenses (1102 Bingham) (.1); exchange correspondence with A. Porter regarding PSA for property (7508 Essex) (.2); exchange correspondence regarding closing and property management expenses (7051 Bennett) (.2).
	Asset Disposition
10/16/2020 KBD	1.00 Work with A. Porter and J. Rak on planning for listing SFR portfolio and title exception and insurance issues (.6), closing planning for property (1700 Juneway) (.1), purchase offer on property (1102 Bingham) (.1), and property manager liens and expenses (.2).
	Asset Disposition
10/19/2020 KBD	0.20 Exchange correspondence with A. Porter regarding sale of property (1102 Bingham).
	Asset Disposition
10/20/2020 KBD	1.30 Work on sale agreement for property (1102 Bingham) and draft correspondence to real estate broker regarding same.
	Asset Disposition
10/22/2020 KBD	0.40 Study correspondence regarding title issue (7237-43 South Bennett, 7933 S Kingston, 8104 S Kingston, 8529 S Rhodes, 1401 W 109th, 310 E 50th, 6807 S Indiana) (.2); exchange correspondence with A. Porter regarding funds from sales of properties (701 S 5th, 8326-38 S Ellis) (.1); study correspondence from real estate broker regarding sale of property (7237 Bennett) (.1).
	Asset Disposition
10/23/2020 KBD	2.00 Telephone conference with real estate broker regarding efforts to sell and close on properties (7237 Bennett, 7109 Calumet, 648 Avers, SFR portfolio) (.2); work on preparation for marketing and listing of single-family residence portfolio and prepare for call with broker and lenders counsel (.5); confer with broker, lenders counsel, and A. Porter regarding single-family residence portfolio marketing and listing planning, title issues, due diligence materials, bid procedures, credit bid interest, and procedure for reviewing bids (.4); exchange correspondence with J. Wine regarding order approving sale of properties without objection in tenth motion to approve sales (4533-47 South Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.3); draft correspondence to real estate broker regarding same (4533-47 South

#### Date Indiv Hours Description

Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.1); attention to closing document (4611 Drexel) (.1); exchange correspondence with A. Porter and J. Wine regarding closing on sales of properties (4533-47 South Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.2); study further correspondence regarding exceptions to title issues (7237-43 South Bennett, 7933 S Kingston, 8104 S Kingston, 8529 S Rhodes, 1401 W 109th, 310 E 50th, 6807 S Indiana) (.2).

Asset Disposition

10/30/2020 KBD

1.40 Exchange correspondence with A. Porter regarding communications with defaulting purchaser (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); confer with A. Porter and real estate broker regarding property sale efforts and various related issues (7600 Kingston, 7656 Kingston, 6949 Merrill, 7237 Bennett, 7109 Calumet, 638 Avers) (1.2).

**Asset Disposition** 

SUBTOTAL: [15.00 5850.00]

Business Operations

10/1/2020 KBD 0.40 Review information from J. Rak regarding real estate taxes (.2); attention to utility invoices issue (.2).

**Business Operations** 

10/5/2020 KBD

0.20 Exchange correspondence with J. Rak regarding buyer's appraiser (2800-06 81st) (.1); review correspondence from J. Wine regarding administrative hearing actions (7109 Calumet) (.1).

**Business Operations** 

10/6/2020 KBD

1.10 Exchange correspondence with insurance adjuster regarding efforts to complete settlement of claim (638 Avers) (.2); attention to notice of attorney's lien (7110 Cornell) (.2); confer with government representative (.7).

**Business Operations** 

10/7/2020 KBD

0.50 Exchange various correspondence regarding corporate issues.

**Business Operations** 

10/9/2020 KBD

0.90 Telephone conference and exchange correspondence with insurance broker and J. Wine regarding potential claim (7110-16 Cornell) (.2); exchange correspondence with property manager and asset manager regarding additional security for property (638 Avers) (.1); study financial reporting from property managers (.5); exchange correspondence with property manager regarding potential property repair (7237 Bennett) (.1).

<u>Date Indiv H</u>	ours Description
	Business Operations
10/11/2020 KBD	0.50 Work on state court actions regarding property (7508 Essex) and exchange correspondence with A. Porter and asset manager.
	Business Operations
10/12/2020 KBD	0.50 Attention to payment of security expense (638 Avers) (.2); work on proofs for insurance settlement and exchange correspondence with adjuster regarding same and potential recovery (638 Avers) (.3).
	Business Operations
10/13/2020 KBD	0.50 Exchange correspondence with property manager and K. Pritchard regarding security service and expense (7237 S. Bennett) (.2); telephone conference with E. Duff regarding property expenses and financial reporting (.3).
	Business Operations
10/14/2020 KBD	0.20 Exchange correspondence with J. Wine regarding lawsuit relating to property (1102 Bingham).
	Business Operations
10/15/2020 KBD	0.30 Telephone conference with J. Wine regarding property manager expense reimbursement (7051 S Bennett, 7749 S Yates, 8201 S Kingston, 8947 S Manistee).
	Business Operations
10/19/2020 KBD	0.20 Attention to property expenses (638 Avers, 1401 W 109th, 7201 Dorchester).
	Business Operations
10/20/2020 KBD	0.50 Exchange correspondence with K. Pritchard regarding insurance issues (.2); work on restoration of funds (.3).
	Business Operations
10/21/2020 KBD	0.40 Study objections to tenth property sales motion.
	Business Operations
10/23/2020 KBD	0.30 Exchange correspondence with insurance adjuster and K. Pritchard regarding claim and expense amounts (638 Avers) (.2); exchange correspondence with asset manager regarding water meter vault compliance (7838-40 S. Yates) (.1).
	Business Operations
10/26/2020 KBD	0.20 Exchange correspondence with insurance adjuster and K. Pritchard regarding recovery of insurance settlement proceeds (638 Avers).
	Business Operations

Date	Indiv	Hours	Description

10/28/2020 KBD

0.40 Exchange correspondence regarding order on second restoration motion (.2); exchange correspondence regarding water meter repair and cost (7838-40 S Yates) (.2).

**Business Operations** 

SUBTOTAL: [ 7.10 2769.00]

#### Claims Administration & Objections

10/1/2020 KBD

3.20 Confer and exchange correspondence with M. Rachlis and J. Wine regarding claims process, standard discovery, joint report on open issues, turnover motion, and various related issues (1.0); telephone conference with A. Porter regarding property record and deed analysis (6751 Merrill, 7110 Cornell) (.2); work on response to claimant's turnover motion and further confer with M. Rachlis and J. Wine regarding same (6751 Merrill, 7110 Cornell) (1.1); study and revise joint status report on open issues and standard discovery requests (.8); attention claimant communication and exchange correspondence with A. Watychowicz regarding same (.1).

Claims Administration & Objections

10/2/2020 KBD

2.90 Study and revise standard discovery requests and exchange correspondence with J. Wine and M. Rachlis regarding same (.5); work on response to turnover motion (7110 Cornell, 6751 Merrill) (1.7); study and revise joint motion regarding standard discovery and exchange correspondence regarding same (.5); telephone conference with J. Wine regarding instructions in investor lender standard discovery requests (.2);

Claims Administration & Objections

10/7/2020 KBD

1.10 Study information relating to potential repair and credit to purchaser (7237 Bennett) (.2); work and correspondence relating to potential claim (7110 Cornell) (.5); draft correspondence to lender's counsel regarding same (7110 Cornell) (.1); work on efforts to resolve dispute with lender regarding letter of credit (7109 Calumet) (.3).

Claims Administration & Objections

10/8/2020 KBD

0.50 Attention to potential claim (7110 Cornell) (.2); attention to communications from claimants (.3).

Claims Administration & Objections

10/9/2020 KBD

0.20 Exchange correspondence regarding potential claim (7110 Cornell).

Claims Administration & Objections

10/10/2020 KBD

0.20 Study institutional lender proposal regarding EquityBuild documents and exchange correspondence with regarding same.

Claims Administration & Objections

<u>Date Indiv H</u>	ours Description
10/11/2020 KBD	0.20 Exchange correspondence with A. Porter regarding property manager claim (7237 Bennett).
	Claims Administration & Objections
10/12/2020 KBD	0.70 Study correspondence from J. Wine regarding personal injury claim and attorney lien (4520 Drexel) (.2); work on communications with claimants (.1); study motion for reconsideration (.4).
	Claims Administration & Objections
10/13/2020 KBD	1.10 Analysis of claims process methodology (.3); work on response to claimants' requests for information (.4); attention to tax claim lawsuit (1102 Bingham) (.3); review proof of claim and correspondence regarding same (.1).
	Claims Administration & Objections
10/14/2020 KBD	2.30 Study claimants' reply brief relating to turnover motion (6751 Merrill, 7110 Cornell) (.3); analysis of letter of credit issues and draft correspondence to A. Porter and M. Rachlis regarding same (7109 Calumet) (.6); draft and revise correspondence to claimants' counsel regarding requests for claims, documents, and information (.5); work on responses to claimants' requests for information (.4); study correspondence from insurance adjuster regarding claim relating to property (638 Avers) (.2); draft correspondence to accountant regarding same and recovery of funds (.1); exchange correspondence with claimants' counsel regarding same (638 Avers) (.2).
	Claims Administration & Objections
10/15/2020 KBD	0.80 Draft correspondence to claimant's counsel regarding proof of claim forms and EB documents and exchange correspondence with M. Rachlis regarding same (.5); study claims by property (.3).
	Claims Administration & Objections
10/16/2020 KBD	0.60 Confer with A. Porter and J. Rak regarding claims analysis planning (.1); work on communications with claimants (.2); draft correspondence to claimants' counsel regarding EB documents and proof of claim forms (.3).
	Claims Administration & Objections
10/19/2020 KBD	0.30 Study reply brief regarding turnover motion (.2); exchange correspondence regarding claimant inquiry relating to post-sale reconciliation (.1).
	Claims Administration & Objections
10/20/2020 KBD	1.00 Draft correspondence to M. Rachlis regarding summary proceedings (.4); attention to response to motion for reconsideration and study correspondence regarding same (.4); review and exchange correspondence regarding state court lawsuit (.2).
	Claims Administration & Objections

<u>Date Indiv H</u>	ours Description
10/22/2020 KBD	3.70 Work on response to claimants' motion for reconsideration.
	Claims Administration & Objections
10/23/2020 KBD	4.20 Draft and revise response to claimants' motion for reconsideration, and draft correspondence to M. Rachlis regarding same (2.8); study hearing transcripts, draft correspondence, and evaluate claimants' proposal for document data base and cost sharing (1.3); study correspondence from claimant regarding institutional lenders and discovery (.1).
	Claims Administration & Objections
10/24/2020 KBD	1.70 Draft and revise response to claimants' motion for reconsideration, and exchange correspondence with M. Rachlis regarding same.
	Claims Administration & Objections
10/25/2020 KBD	2.00 Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M. Rachlis regarding same (1.9); review correspondence regarding EB documents for repository (.1).
	Claims Administration & Objections
10/26/2020 KBD	3.20 Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M. Rachlis and J. Wine regarding same (1.6); revise response to document database proposal and exchange various correspondence regarding same (.9); study SEC opposition to motion for reconsideration (.2); prepare for hearing on claims before Judge Lee and exchange correspondence regarding same (.5).
	Claims Administration & Objections
10/27/2020 KBD	7.40 Prepare for hearing before Judge Lee on claims (1.1); work on claims process planning and progression of review (1.0); confer with M. Rachlis and J. Wine regarding issues relating to hearing before Judge Lee (.8); attention to communications from numerous claimants (.9); confer with SEC, M. Rachlis, and J. Wine (.4); appear at hearing before Judge Lee (2.3); confer with M. Rachlis regarding hearing before Judge Lee (.3); study claimants' motions to stay and to certify questions (.3); review and draft correspondence regarding claim (4611 Drexel) (.2); exchange correspondence regarding document database proposal (.1).
	Claims Administration & Objections
10/28/2020 KBD	2.10 Confer with M. Rachlis, J. Wine, and A. Porter regarding claimants' motion to stay property sales (6250 Mozart, 1131-41 79th), claims review issues, and various related property sale issues (1.5); exchange correspondence regarding estimated closing costs (638 Avers) (.1); exchange correspondence regarding planning for sale of properties and lender request for delay (6250 Mozart, 1131-41 79th) (.3); study correspondence from M. Rachlis regarding claimants' appeal (.2).

Claims Administration & Objections

Rachlis regarding claimants' appeal (.2).

<u>Date Indiv</u> <u>H</u>	ours Description		
10/29/2020 KBD	1.40 Work on communications with claimants regarding claims process and standard discovery (1.1); exchange correspondence with J. Wine regarding logistics for disseminating claim forms and supporting documents to claimants (.3). Claims Administration & Objections		
10/30/2020 KBD	2.70 Telephone conferences with SEC (.3); exchange correspondence with J. Wine and A. Watychowicz regarding service of information relating to claims (.2); work on communications with claimants regarding claims process (1.2); draft correspondence to M. Rachlis and J. Wine regarding claimants' appeal (6250 Mozart, 1131-41 79th) (.3); study issues relating to same (6250 Mozart, 1131-41 79th) (.5); exchange correspondence with J. Wine regarding communication with claimant (4611 Drexel) (.2).		
	Claims Administration & Objections		
SUBTOTAL:	[43.50 16965.00]		
Status Reports	_		
10/5/2020 KBD	0.20 Exchange correspondence with J. Wine regarding information for next status report.		
	Status Reports		
10/12/2020 KBD	0.20 Exchange correspondence with J. Wine regarding master asset list and state court litigation.		
	Status Reports		
10/15/2020 KBD	0.50 Study draft statusreport.		
	Status Reports		
10/16/2020 KBD	1.60 Study and revise draft status report.		
	Status Reports		
10/19/2020 KBD	1.50 Study and revise draft status report and exchange various correspondence regarding same.		
	Status Reports		
10/20/2020 KBD	2.10 Work on status report and exchange various correspondence regarding same.		
	Status Reports		

<u>Date Indiv</u> Ho	urs Description	
10/22/2020 KBD	0.10 Exchange correspondence with J. Wine regarding claims information for status report.	
	Status Reports	
10/28/2020 KBD	0.20 Exchange correspondence with J. Wine regarding status report, property sales, and timing.	
	Status Reports	
10/29/2020 KBD	0.40 Work on status report and exchange various correspondence regarding sa	me.
	Status Reports	
SUBTOTAL:	[ 6.80 265	2.00]
Tax Issues		
10/12/2020 KBD	0.20 Exchange correspondence with tax administrator regarding receivership tax return.	
	Tax Issues	
10/13/2020 KBD	0.30 Attention to receivership tax return and draft correspondence to K. Pritchar regarding same.	d
	Tax Issues	
SUBTOTAL:	[ 0.50 19	5.00]
	72.90 \$28,43	31.00
	Summary of Activity	
Kevin B. Duff	<u>Hours Rate</u> 72.90 390.00 \$28,43	1.00

## **SUMMARY**

Other Charges	\$28,431.00 \$0.00
TOTAL DUE	\$28,431.00

# Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 31 of 182 PageID #:20300 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 8, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621128

Legal Fees for the period November 2020 \$35,451.00

Expenses Disbursed \$0.00

Due this Invoice \$35,451.00

Page 2

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Asset Disposition		_	
11/2/2020	KBD	0.40	Study correspondence from real estate broker regarding sales contract (1102 Bingham) (.2); study intervenor motion to stay (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2).
			Asset Disposition
11/3/2020	KBD	1.70	Work on closing documents (431 E. 42nd, 816 Marquette) (.5); exchange correspondence regarding sales of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.5); revise sales contract (1102 Bingham) (.7).
			Asset Disposition
11/4/2020	KBD	1.40	Revise contract for sale of property (1102 Bingham) (.7); exchange correspondence and telephone conference with real estate broker regarding same (1102 Bingham) (.4); exchange correspondence with A. Porter regarding same (1102 Bingham) (.2); review correspondence regarding inquiry from buyer's lender (7237 Bennett) (.1).
			Asset Disposition
11/5/2020	KBD	0.40	Exchange correspondence with A. Porter regarding potential closings of properties (6250 Mozart, 1131 E 79th, 7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); attention to closing of property sale (431 E 42nd) (.2).
			Asset Disposition
11/9/2020	KBD	0.50	Exchange correspondence regarding property sales (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); study draft response to intervenor motion to stay (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); exchange correspondence with A. Porter regarding receipt and deposit of post-sale reconciliation payment (7201 Dorchester) (.1).
			Asset Disposition
11/10/2020	) KBD	2.20	Work on response to intervenor motion to stay sale of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill).
			Asset Disposition
11/11/2020	KBD	3.90	Work on closing documents (4315 Michigan, 4533 Calumet, 6949 Merrill, 7600 Kingston, 7656 Kingston, 7442 Calumet, 7701 Essex) (1.0); attention to deposit of funds from title company (7201 Dorchester) (.2); work on response to intervenor motion to stay sales (7600 Kingston, 7656 Kingston, and 6949 Merrill) (2.5); study correspondence from purchaser's counsel regarding demand to close sale and related correspondence (6949 Merrill) (.2).
			Asset Disposition
11/15/2020	) KBD	0.20	Exchange correspondence regarding sale of properties (6949 South Merrill, 7600 South Kingston, and 7656 South Kingston) and pending motion.  Asset Disposition

Date Indiv Hours Description

11/16/2020 KBD

1.70 Confer with M. Rachlis and A. Porter regarding sale of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill) (1.2); confer with SEC (.5).

**Asset Disposition** 

11/17/2020 KBD

0.70 Work on additional closing documents and exchange correspondence with A. Porter regarding same (7600 Kingston, 7656 Kingston) (.3); exchange correspondence with A. Porter regarding pricing and allocation of sale proceeds for single family residence portfolio and title company communication (.2); attention to sales contract (1102 Bingham) (.2).

Asset Disposition

11/18/2020 KBD

2.80 Review contract for sale of property (1102 Bingham) (.2); exchange correspondence with A. Porter regarding same (1102 Bingham) (.1); confer with M. Rachlis regarding same (1102 Bingham) (.2); exchange correspondence with real estate broker regarding purchase and sale agreement (1102 Bingham) (.2); confer with A. Porter and J. Rak regarding efforts to sell properties and closings (1102 Bingham, 7600 Kingston, 7656 Kingston, 6949 Merrill) and market single family residence portfolio (.4); study and revise motion to dismiss intervenor appeal and exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.7).

**Asset Disposition** 

11/19/2020 KBD

2.00 Exchange correspondence with real estate broker regarding purchase and sale agreement (1102 Bingham) (.2); study and revise motion to dismiss intervenor appeal and exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.5); work on bid procedures for single family residence portfolio (.3).

**Asset Disposition** 

11/20/2020 KBD

3.50 Participate in appellate court mediation with intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8); telephone conferences with A. Porter regarding marketing of and allocation issues relating to single family residence portfolio (.3); telephone conference with real estate broker and A. Porter regarding same (.2); exchange correspondence with M. Rachlis regarding sale procedures for single family residence portfolio (.1); telephone conference with real estate broker regarding contract and marketing summary (1102 Bingham) (.1).

Asset Disposition

11/21/2020 KBD

0.20 Exchange correspondence with real estate broker and A. Porter regarding treatment of offers for single family residence portfolio.

Asset Disposition

<u>Date Indiv H</u>	lours Description
11/22/2020 KBD	2.30 Study and revise response to intervenor's motion for earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.0); exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3).
11/23/2020 KBD	Asset Disposition  2.70 Work on response to intervenor's motion for earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.5); exchange correspondence regarding motion to approve sale of property (7237-43 S. Bennett) (.2).
11/25/2020 KBD	Asset Disposition  0.20 Exchange correspondence regarding sale contract and timing for motion to approve (1102 Bingham).
11/28/2020 KBD	Asset Disposition  0.20 Exchange correspondence with A. Porter regarding broker agreement and publication notice for sale of single-family residence portfolio.
11/29/2020 KBD	Asset Disposition  0.30 Study and revise offering memorandum for sale of single-family residence portfolio and draft correspondence to A. Porter regarding same.
	Asset Disposition
11/30/2020 KBD	0.80 Exchange correspondence with J. Wine and title company representative regarding motion to approve sale of property (1102 Bingham) (.3); work on offering memorandum and exchange correspondence regarding same for single-family residence portfolio (.2); attention to sale of properties and intervenor appellate docketing statement (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.3).
	Asset Disposition
OTAL:	[28.10 10959.00]
ess Operations	<u> </u>
11/3/2020 KBD	0.20 Attention to payment of insurance adjuster (638 Avers).  Business Operations
11/4/2020 KBD	0.20 Exchange correspondence with K. Pritchard regarding property manager records.  Business Operations

11/11/2020 KBD	0.20 Exchange correspondence regarding efforts to obtain insurance settleme proceeds (638 Avers).		
	Business Operations		
11/12/2020 KBD	0.20 Review financial and expense information from property manager regarding property expenses (638 Avers, 1409 W 109th).		
	Business Operations		
11/13/2020 KBD	0.40 Exchange correspondence with K. Pritchard regarding property expenses (638 Avers, 1409 W 109th) (.1); study property manager financial reporting (.3).		
	Business Operations		
11/20/2020 KBD	0.30 Exchange correspondence with E. Duff regarding potential claim relating to property (7749 Yates) (.2); exchange correspondence regarding post-sale accounting reconciliation (.1).		
	Business Operations		
TAL:	<u> </u>		

#### Claims

11/2/2020 KBD

2.90 Exchange correspondence with J. Wine regarding production of EB claim forms and EB documents (.4); study claimants' objections to tenth motion to approve sales and draft responses to same and exchange correspondence with J. Wine (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (1.5); attention to personal injury claim (7114 Cornell) (.1); review draft correspondence to claimants and exchange correspondence regarding same and proposed standard responses to FAQ (.7); attention to master claims list (.2).

Claims Administration & Objections

11/3/2020 KBD

1.50 Work on communication with claimants and responses to FAQ (.8); study claimants' motion for reconsideration (.1); study correspondence from J. Wine regarding and address issues relating to EB document repository (.1); study draft response to claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.5).

Claims Administration & Objections

11/4/2020 KBD

5.00 Draft reply to claimants' objection to tenth sales motion (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (2.3); work on response to claimants' motion to stay sales pending appeal (6250 S. Mozart and 1131-41 E. 79th) (2.5); attention to claims (.2).

Claims Administration & Objections

11/5/2020 KBD

1.10 Exchange correspondence and telephone conference with M. Rachlis and J. Wine to prepare for hearing before Judge Lee on claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.4); appear before Judge Lee for hearing on claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.1); exchange correspondence with asset manager regarding property valuation and cash balance information (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (.2); exchange correspondence with K. Pritchard regarding spreadsheet for property (638 N Avers) account for lender with details regarding receipts and disbursements (.2); attention to communication with claimant and claimants' counsel (.2).

Claims Administration & Objections

11/6/2020 KBD

6.30 Attention to claimant communication regarding claim process and response to same (.2); work on reply in support of tenth sales motion and draft declaration in support (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 SouthIndiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (6.1).

Claims Administration & Objections

11/9/2020 KBD

2.90 Confer with M. Rachlis, J. Wine, and A. Porter regarding sale of properties (7600 Kingston, 7656 Kingston, 6751 Merrill) and related motions to stay (1.2), potential resolution of claims against properties (.3), and claims process logistics and planning (.7); work on responses to FAQ from claimants regarding claims process (.2); attention to claimant communications regarding claims (.5).

Claims Administration & Objections

11/10/2020 KBD

0.80 Attention to communications with claimants regarding claims and claims process (.6); address claim against property (1449 Talman) (.2).

Claims Administration & Objections

11/11/2020 KBD

3.60 Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place and 6250 S. Mozart) (2.2); attention to claimant's counsel inquiry regarding status report (.2); work on communications with claimants and counsel (.6); study revised claims process outline and standard discovery requests (.6).

Claims Administration & Objections

11/12/2020 KBD

8.60 Work on motion to dismiss appeal (1131-41 E. 79th Place and 6250 S. Mozart) (7.4); study claimant lenders' reply in support of motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.3); draft surreply in response to same (6250 S. Mozart and 1131-41 E. 79th) (.5); attention to correspondence from claimants' counsel regarding request for claim forms and documentation (.4).

Claims Administration & Objections

Kevin B. Duff, Receiver

Date	Indiv	Hours	Description

11/13/2020 KBD

5.00 Review revision to surreply to claimants' motion to stay and exchange correspondence regarding same (1131-41 E. 79th Place and 6250 S. Mozart) (.3); study claimant's response (1131-41 E. 79th Place and 6250 S. Mozart) (.1); telephone conference with SEC (.4); work on motion to dismiss appeal and exchange various correspondence with M. Rachlis, J. Wine, and A. Watychowicz regarding same (1131-41 E. 79th Place and 6250 S. Mozart) (3.7); attention to claimant's counsel's inquiry (8326-58 S Ellis, 6356 S California, 6355-59 S Talman, 2736 W 64th, 7051 S Bennett, and 7957-59) (.4); draft correspondence to claimant's counsel regarding insurance proceeds and closing costs (638 N Avers) (.1).

Claims Administration & Objections

11/14/2020 KBD

5.50 Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place, 6250 S Mozart).

Claims Administration & Objections

11/15/2020 KBD

3.10 Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place, 6250 S Mozart).

Claims Administration & Objections

11/16/2020 KBD

3.70 Work on motion to dismiss appeal and docketing statement and various communications relating to same (1131-41 E. 79th Place and 6250 S. Mozart) (3.5); revise correspondence to claimant's counsel regarding request for information (8326-58 S Ellis, 6356 S California, 6355-59 S Talman, 2736 W 64th, 7051 S Bennett, and 7957-59 S Marquette) (.2).

Claims Administration & Objections

11/17/2020 KBD

0.30 Work on response to claimant's counsel inquiry regarding sale of property (8326-54 Ellis).

Claims Administration & Objections

11/18/2020 KBD

1.20 Attention to claimant inquiry regarding sale of property (8326-54 Ellis) (.2); confer with M. Rachlis and SEC (.5); confer with M. Rachlis regarding appellate mediation planning and motions to dismiss appeals (1131-41 E. 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to claimant communications relating to claims (.1).

Claims Administration & Objections

11/19/2020 KBD

0.40 Attention to claimant's updated custodian information (.1); exchange correspondence with claimant's counsel regarding request for records relating to EquityBuild and communications relating to same (.3).

Claims Administration & Objections

11/20/2020 KBD	1.30 Participate in appellate court mediation with lender claiman		
	6250 Mozart) (.6); confer with claimant lenders' counsel, re and A. Porter regarding marketing of and allocation issues family residence portfolio (.6); attention to claimant communication.	relating	to single
	Claims Administration & Objections		
11/23/2020 KBD	0.90 Study and revise draft response to claimants' motion for proattention to claimants' communications regarding claims prexchange and attention to correspondence with counsel for Avers, 6558 S. Vernon, 5618 S. Martin Luther King) (.2).	rocess (	.2);
	Claims Administration & Objections		
11/24/2020 KBD	2.90 Study and revise draft response to claimants' motion for pro (2.4); attention to claimants' communications regarding cla (.3); work to gather information for claimant relating to estim costs for property (638 Avers) (.2).	ims pro	cess
	Claims Administration & Objections		
11/25/2020 KBD	3.60 Confer and exchange correspondence with M. Rachlis and claims process logistics and planning (3.5); attention to res claimants (.1).		
	Claims Administration & Objections		
11/30/2020 KBD	0.70 Work on potential resolution of claims and exchange corres regarding same (.3); attention to claimant communications process and to rollover situations (.2); review claimants' rest to dismiss appeal (6250 S. Mozart and 1131-41 E. 79th)(.2)	relating sponse t	to claims
	Claims Administration & Objections		
ΓΟΤΑL:	[61	.30	23907.00]
	90	0.90	\$35,451.00
	Summary of Activity		
ı B. Duff	Hours	<u>Rate</u> 390.00	\$35,451.00

### **SUMMARY**

TOTAL DUE	\$35,451.00
Other Charges	\$0.00
Legal Services	\$35,451.00

## Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 40 of 182 PageID #:20309 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 12, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621129

Legal Fees for the period December 2020 \$23,556.00

Expenses Disbursed \$0.00

Due this Invoice \$23,556.00

	Date	<u>Indiv</u>	<u>Hours</u>	Description		
Asset Ar	nalysis & Re	cover	<u>/_</u>			
	12/8/2020	KBD	0.20	Confer with A. Porter regarding potential claims.		
				Asset Analysis & Recovery		
	12/30/2020	KBD	0.30	Exchange correspondence regarding potential asset.		
				Asset Analysis & Recovery		
	12/31/2020	KBD	0.20	Exchange correspondence regarding potential asset.		
				Asset Analysis & Recovery		
SUBTOT	AL:				[ 0.70	273.00]
Asset Di	sposition					
	12/1/2020	KBD	0.30	Exchange regarding communication from title company regarding earnest money (1102 Bingham) (.1); correspondice of sales (7600 Kingston, 7656 Kingston, 6949 M	ondence regar	
				Asset Disposition		
	12/2/2020	KBD	0.60	Review and execute affidavit and exchange correspondence regarding same (7600 Kingston, 7656 Kingston) (.2); ecorrespondence with J. Rak and telephone conference representative regarding sale proceeds (4317 S. Michiexchange correspondence regarding notice of sales (7 Kingston, 6949 Merrill) (.3).	xchange with title comp gan) (.1); draft	oany and
				Asset Disposition		
	12/3/2020	KBD	0.30	Exchange correspondence regarding notice of property same (7600 Kingston, 7656 Kingston, 6949 Merrill).	sales and filin	g of
				Asset Disposition		
	12/4/2020	KBD	0.50	Study intervenor emergency motion to vacate sales (76 Kingston, 6949 Merrill) (.2); telephone conference with regarding various remaining properties and related sales.	real estate bro	
				Asset Disposition		
	12/6/2020	KBD	1.30	Study, revise, and exchange correspondence regarding intervenor emergency motion (7600 Kingston, 7656 Kingston, 7656 Kingston)		errill).
				Asset Disposition		

Date Indiv Ho	ours Description
12/7/2020 KBD	1.60 Study, revise, and exchange correspondence regarding response to intervenor emergency motion (7600 Kingston, 7656 Kingston, 6949Merrill).
	Asset Disposition
12/8/2020 KBD	0.40 Telephone conference with A. Porter regarding sale of properties, property management, and various related issues (7237 Bennett, 1131 79th St., 6250 Mozart, 638 Avers).
	Asset Disposition
12/10/2020 KBD	1.20 Study and revise 11th sales motion and exchange various correspondence regarding same (7237 Bennett) (.4); telephone conference and exchange correspondence with real estate broker regarding property repairestimates (7237 Bennett) (.3); work on intervenor appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); exchange correspondence regarding water bill issue (4533 S. Calumet) (.2).
	Asset Disposition
12/11/2020 KBD	0.30 Work on eleventh sales motion (7237 Bennett) (.1); address issues relating to intervenor appeal and sale of properties (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).
	Asset Disposition
12/13/2020 KBD	1.20 Study and revise consolidated 11th motion to approve sale of property (7237 Bennett) and for post-sale reimbursement of expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel).
	Asset Disposition
12/14/2020 KBD	0.20 Exchange correspondence regarding revisions to 11th motion to confirm sale and proposed order (7237 Bennett).
	Asset Disposition
12/16/2020 KBD	0.20 Exchange correspondence regarding selling entity EIN (6250 Mozart).
	Asset Disposition
12/22/2020 KBD	1.00 Review and execute closing documents and confer with J. Rak and A. Watychowicz regarding same (1131 E. 79th, 6250 Mozart) (.6); exchange correspondence regarding water bill issue for closed property (4533 Calumet) (.1); exchange correspondence with A. Porter regarding sale of property (1102 Bingham) (.1); exchange correspondence regarding final reporting and distribution for property (3074 Cheltenham) (.2).
	Asset Disposition

	Date Indiv Ho	rs Description	
	12/29/2020 KBD	0.30 Exchange correspondence regarding publication family residence portfolio (.2); study opposition (.1).	
		Asset Disposition	
	12/30/2020 KBD	0.30 Exchange correspondence with A. Porter rega company (431 E 42nd Pl.) (.2); exchange corregarding sale of property (1102 Bingham) (.1	espondence with A. Porter
		Asset Disposition	
SUBTOT	AL:		[ 9.70 3783.00]
Business	Operations		
	12/3/2020 KBD	0.20 Confer with J. Wine regarding funds restoration	n issues.
		Business Operations	
	12/9/2020 KBD	0.90 Confer with A. Porter and J. Wine regarding standard administrative actions, and sales issues (7237 work on motion to pay expenses (7749 S Yate 8047-55 S Manistee, 7051 S Bennett, 431 E 4	Bennett, 638 Avers)(.6); s, 8201 S Kingston,
		Business Operations	
	12/10/2020 KBD	0.40 Work on motion to pay expenses (7749 S Yate S Manistee, 7051 S Bennett, 431 E 42nd Plac	
		Business Operations	
	12/17/2020 KBD	0.20 Draft correspondence to property manager req expenses (638 Avers).	arding property
		Business Operations	
	12/21/2020 KBD	0.20 Attention to property expenses and exchange regarding same (1401 W 109th).	various correspondence
		Business Operations	
	12/22/2020 KBD	0.20 Exchange correspondence regarding notice at property (1516 E 85th Place).	nd potential claim relating to
		Business Operations	
	12/23/2020 KBD	0.40 Attention to payment of property expenses (14	01 W 109th, 4533 S Calumet).
		Business Operations	

<u>Date</u> Indiv	Hours Description	
12/28/2020 KBI	D 0.20 Attention to notices regarding pro	perties (5618 S. MLK, 2129 W 71st).
	Business Operations	
SUBTOTAL:		[ 2.70 1053.00]
Claims Administration &	<u>Objections</u>	
12/1/2020 KBI		exchange correspondence regarding
	Claims Administration & Objection	ns
12/3/2020 KBI	conference with J. Wine regarding	g production of investor records (.2); confer achlis regarding claims process and
	Claims Administration & Objection	ns
12/4/2020 KBI	· · · · · · · · · · · · · · · · · · ·	s report and exchange correspondence with same (.8); study and revise draft hone conference with SEC (.5).
	Claims Administration & Objection	ns
12/6/2020 KBI	D 5.20 Study and revise reply in support (1131 E 79th, 6250 Mozart).	of motion to dismiss claimants' appeal
	Claims Administration & Objection	ns
12/7/2020 KBI	(1131 E 79th, 6250 Mozart) and 6	of motion to dismiss claimants' appeal exchange various correspondence regarding cation with claimant and claimant's counsel
	Claims Administration & Objection	ns
12/8/2020 KBI	9 1	ling notice of hearing (.2); attention to im (.1); work on response toclaimant (.1).
	Claims Administration & Objection	ns
12/9/2020 KBI	attention to inquiry from claimant correspondence with J. Wine reg	

Date Indiv Hours Descripti	
Date Indiv Hours Describi	m

regarding claims against properties in single family residence portfolio (.2).

Claims Administration & Objections

12/10/2020 KBD

0.40 Work on response to claimant inquiry (7750 S Muskegon) (.2); attention to inquiry from claimant counsel regarding real estate tax notice and exchange correspondence regarding same (431 E 42nd) (.2).

Claims Administration & Objections

12/11/2020 KBD

2.50 Work on responses to claimants (.5); work with M. Rachlis and J. Wine on on claims process and various related issues (2.0).

Claims Administration & Objections

12/14/2020 KBD

2.50 Work with M. Rachlis and J. Wine regarding claims process, tranches, protective order, claims process outline, and status report (1.8); study proposed tranche grouping and exchange correspondence with M. Rachlis and J. Wine regarding same (.3); attention to claimant communications (.3); draft correspondence to claimant's counsel regarding notice of tax sale (431 E. 42nd Pl.) (.1).

Claims Administration & Objections

12/15/2020 KBD

2.60 Study, revise, and exchange various correspondence relating to multiple drafts of joint status report, claims process, and standard written discovery (1.5); confer with M. Rachlis and J. Wine regarding same (.5); work on communication to claimants regarding claims process (.2); work on response to claimants (.2); exchange correspondence with J. Rak regarding extension of agreement and draft correspondence to claimant's counsel regarding same (638 Avers) (.1); studyclaimants' counsel's letter to Judge Lee (.1).

Claims Administration & Objections

12/16/2020 KBD

2.90 Exchange correspondence regarding claims process discussions between participants and various related issues (.8); exchange correspondence regarding communication with claimant regarding claims issues (.2); telephone conference with SEC (.2); confer with J. Wine regarding various claims process issues (.4); study revised joint status report, revised claim procedures, and revised standard written discovery and exchange correspondence with J. Wine regarding same (1.0); draft correspondence regarding communication from claimant's spouse (.2); exchange correspondence regarding claimant communication (.1).

Claims Administration & Objections

12/17/2020 KBD

4.60 Prepare for hearing before Judge Lee (1.7); confer with SEC (.5); appear before Judge Lee for hearing (.9); work on insurance claim, property expenses, accounting, and estimated closing costs for property (638 Avers) (1.2); draft correspondence regarding claimant inquiries (.3).

Claims Administration & Objections

12/18/2020 KBD

4.00 Work on proposed order regarding claims and EquityBuild documents and study and exchange various correspondence regarding same (.5); work on property expenses, accounting, and estimated closing costs for property (638 Avers) (2.0); exchange various correspondence regarding estimated closing costs (638 Avers) (1.5); study and revise draft order and work on same with J. Wine.

Claims Administration & Objections

12/20/2020 KBD

0.20 Study correspondence regarding property expenses, accounting, and estimated closing costs for property (638 Avers).

Claims Administration & Objections

12/21/2020 KBD

2.50 Work with A. Porter regarding analysis for estimated closing costs, accounting of funds and expenses, and potential credit bid (638 Avers) (.5); separate analysis of mortgage claims and allocation of costs (638 Avers) (1.1); follow up conversation with A. Porter regarding same (638 Avers) (.2); telephone conference with SEC (.3); attention to claimant communications (.2); exchange correspondence with J. Wine regarding proposed order and proposed claimsprocess outline (.2).

Claims Administration & Objections

12/22/2020 KBD

1.50 Study and revise proposed order relating to claims and EB documents and exchange correspondence regarding same (.4); study and revise correspondence regarding potential claim (638 Avers) (.1); work on estimated closing costs, property expenses, and accounting information for property and draft correspondence to claimant's counsel regarding same (638 Avers) (.3); revise correspondence to claimant's counsel (6437-41 S Kenwood Avenue, 8100 S Essex Avenue, 701-13 S 5th Avenue, 7508 S Essex Avenue) (.2); attention to claimant correspondence and request for claims documentation (.3); exchange correspondence regarding notice and potential claim relatingto property (1516 E 85th Place) (.2).

Claims Administration & Objections

12/23/2020 KBD

0.70 Exchange correspondence with M. Rachlis and J. Wine regarding production of EB documents and claims documentation to claimants (.3); draft correspondence to claimant regarding requested claims information(.4).

Claims Administration & Objections

<u>Date</u> Indiv Ho	ours Description			
12/24/2020 KBD	Study proposed changes to claims process represent the Rachlis and J. Wine regarding same.	notion and	l confer with	ı M.
	Claims Administration & Objections			
12/28/2020 KBD	2.60 Work on claims review and claims process (2 regarding potential claim (.1); attention to co			
	Claims Administration & Objections			
12/29/2020 KBD	3.20 Work on claims review and claims process (7 processoutline for court (1.5).	I.7); study	and revise	claims
	Claims Administration & Objections			
12/30/2020 KBD	0.50 Study claims process outline and exchange regarding same.	various co	rresponden	ce
	Claims Administration & Objections			
12/31/2020 KBD	0.20 Exchange correspondence regarding claima	nt commu	nications.	
	Claims Administration & Objections			
DTAL:			[47.30	18447.00]
			60.40	\$23,556.00
	Summary of Activity	Hours	Pata	
3. Duff		Hours 60.40	Rate 390.00	\$23,556.00

### **SUMMARY**

TOTAL DUE	\$23,556.00
Legal Services Other Charges	\$23,556.00 \$0.00

## **EXHIBIT G**

# Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 50 of 182 PageID #:20319 Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 8, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622127

Legal Fees for the period October 2020 \$97,469.00

Expenses Disbursed \$793.03

Due this Invoice \$98,262.03

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description		
Accounting/Auditing		<u>—</u>			
10/7/2020	KMP	1.30	Study statements for all Receivership estate accounts	<b>S</b> .	
			Accounting/Auditing		
SUBTOTAL:				[ 1.30	182.00]
Asset Analysis & Re	covery	<u>_</u>			
10/27/2020	) JR	1.40	Work with E. Duff and accounting firm on June, July, reporting.	August and Se	ptember
			Asset Analysis & Recovery		
SUBTOTAL:				[ 1.40	196.00]
Asset Disposition		_			
10/1/2020	AEP	0.60	Teleconference with K. Duff and receivership broker responding to prospective purchasers' requests for conchester) and alleged damage to receivership property; prepare e-mail to counsel for prospective purchase property regarding closing credit offer and consequents same (.2).	redits (7201 S perty (7237 S B aser of receiver	sennett) rship
			Asset Disposition		
	MR	0.50	Attention to issues on tenth motion for sales (.3); confug. Wine regarding issues on property sales (7201 Do Bennett) (.1); attention to issues on property dispositi Wine (7201 S. Dorchester and 7237 S. Bennett) (.1).	rchester and 7 ion with K. Duf	237
			Asset Disposition		
	JR	6.50	Update property tax reports regarding payments and institutional lenders (.7); exchange correspondence v status of post-closing reconciliation for property (7110 email from J. Wine regarding request for production of post-closing (7201 S. Constance) and provide same May financial reporting (3.3); draft closing checklist for information for property (7442 S. Calumet) (.4); draft property with critical information (7442 S. Calumet) (.4 for property with critical information (6217 S. Dorches checklist for property with critical information (4317 S. closing checklist for property with critical information exchange correspondence with the appraisal comparinspection (2800 E. 81st) (.1); exchange correspondence management requesting coordination of same (2800 correspondence with property management requesting diligence documents for properties (4317 S. Michigar (.1).	with K. Duff reg 0 S. Cornell) (. of closing docu (.1); further rev or property with closing checkli 4); draft closing ster) (.4); draft (.4); Michigan) (.4) (.7255 S. Eucliony regarding apence with propents E. 81st) (.1); eng updated duce	parding 1); review Iments View of In critical In critical In checklist In closing In clo

JR

Asset Disposition

10/2/2020 MR 0.40 Further attention to tenth sales motion.

**Asset Disposition** 

4.80 Review email from the title company water department regarding water application (5618 Martin Luther King) (.1); update property folder and exchange correspondence with A. Porter regarding same (5618 S. Martin Luther King) (.1); exchange correspondence with the title company requesting water ledger regarding same, review and update electronic file (5618 Martin Luther King) (.2); review email from property manager inquiring about permission to provide buyer with property financial documents related to closing (4611 S. Drexel) (.1); review email from property management requesting buyer information related to sold properties and provide same (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.1); review subsidy contracts and update electronic files in anticipation of closing for property (1700 Juneway) (1.2); exchange correspondence with buyer's counsel regarding same (1700 Juneway) (.1); exchange correspondence with leasing manager requesting missing subsidy agreements related to property (1700 Juneway) (.1); exchange correspondence with property management requesting updates to property information in preparation for closing (7201 S Dorchester) (.1); update closing documents in preparation for closing (1700 Juneway) (2.6); exchange correspondence with buyer's counsel requesting review and approval of notice to tenant letters for property in preparation for closing (7201 S. Dorchester) (.1)...cont'd

**Asset Disposition** 

JR

2.40 Draft closing checklist with crucial property information in preparation for closing (7701 S. Essex) (.7); draft water application in anticipation of closings (1422 E. 68th) (.2); draft water application in anticipation of closings (7255 S. Euclid) (.2); draft water application in anticipation of closings (4317 S. Michigan) (.2); draft water application in anticipation of closings (6217 S. Dorchester) (.2); draft water application in anticipation of closings (74611 S. Drexel) (.2); draft water application in anticipation of closings (7701 S. Essex) (.2); draft water application in anticipation of closings (2800 E. 81st) (.3).

**Asset Disposition** 

10/4/2020 MR 0.60 Review and follow up on draft tenth sales motion.

**Asset Disposition** 

10/5/2020 JRW 0.90 Review and revise 10th motion to confirm sales (.1); related communications with A. Watychowicz and K. Duff regarding service upon claimants by mail (.1) and with K. Pritchard regarding notice of motion (.1); prepare publication notice (.6).

10/5/2020 JR

4.30 Review email from J. Wine and provide requested closing update related to property (7109 S. Calumet) (.1); review email from K. Duff regarding appraisal information for property (2800 E 81st) and provide appraisal information to property management regarding same (.1); follow up correspondence with property management regarding buyer request for subsidy documentation related to property (1700 Juneway) (.1); further communication with buyer's counsel regarding same (1700 Juneway) (.1); review email from buyer's counsel regarding approval related to notice to tenants and update same (7201 S. Dorchester) (.7); review updated rent roll delinquency report and leases and update certified rent roll in anticipation of closing (7201 S Dorchester) (1.2): exchange communication with broker and provide requested survey for property (7701 S. Essex) (.1); exchange communication with buyer and request lender information and title related information for purchase of properties (7701 S. Essex and 7442 S. Calumet) (.2); draft water application in anticipation of closings (4533 S. Calumet) (.2); draft water application in anticipation of closings (4750 S. Indiana) (.2); draft water application in anticipation of closings (7024 S. Paxton) (.2); draft water application in anticipation of closings (7840 S. Yates) (.2); review email from E. Duff related to May financial reports and correct discrepancies (.9).

**Asset Disposition** 

KMP 2.00 Prepare exhibits and notice for tenth motion to confirm sales (.6); finalize motion and related documents and file same with court (.4); serve on defendant and all investors and claimants (1.0).

**Asset Disposition** 

10/6/2020 KMP

0.40 Prepare form for wire transfer to title company for payment of water bill to facilitate closing on property (5618 King Drive), and communications with K. Duff, A. Porter, title company representative, and bank representatives regarding same.

Asset Disposition

**AEP** 

1.30 Review revised title commitment on receivership property (7024 S Paxton) and update closing checklist (.1); teleconference with escrow agent regarding water charges due upon purchase of transfer stamps for receivership property (5618 S King) (.1), teleconference with K. Duff regarding closing (.1), and preparation of e-mail to K. Pritchard regarding wire transfer of funds to title company (.1); teleconference with receivership broker regarding negotiations with prospective purchaser of receivership property (7201 S Dorchester) (.2); read e-mail from J. Wine regarding status of inspections of receivership properties continued for housing court hearings on 10/08 (7201 S Constance, 7600 S Kingston, 638 N Avers, and 7237 S Bennett), review orders, and prepare e-mail to counsel for purchaser of receivership property (7201 S Constance) regarding coordination of efforts to obtain additional extension of time (.3); review release received in connection with payment of judgment recorded against receivership property (7024 S Paxton), research public records to find original judgment order, and prepare e-mail to title

underwriter regarding guidance on recording of release and update to title commitment (.2); teleconference with adjuster regarding final inspection of former receivership property (7943 S Essex) for purpose of closing insurance claim and prepare e-mail to buyer regarding same (.2).

**Asset Disposition** 

10/6/2020 JRW

0.20 Correspondence from A. Porter to buyer of property (7201 S Constance) regarding inspection in housing court matter (.1); correspond with A. Porter and J. Rak regarding release of lien (7024 S Paxton and 7114 S Cornell) (.1).

Asset Disposition

JR

5.60 Review email from property management regarding production of owner statement to lender for property and follow up correspondence with A. Porter regarding same (4611 Drexel) (.1); review post-closing reconciliation report and update electronic files for all closed properties (.4); request same from property management (.2); review email from property management regarding an incident report and an attorney letter related to a tenant incident at property (7110 S. Cornell) (.2); exchange correspondence with A. Porter and K. Duff regarding same (7110 S. Cornell) (.1); exchange correspondence with K. Pritchard regarding confirmation of payment of Houston property taxes (1102 Bingham) (.1); review email from A. Porter regarding scheduling of closings (1700 Juneway, 7201 Dorchester. 7508 Essex and 6558 Vernon) (.2); follow up correspondence with A. Porter regarding requested property subsidy information for property (1700 Juneway) (.1); further correspondence with A. Porter advising on expiration of water certificate applications for properties (1700 Juneway, 7201 Dorchester, 7508 Essex and 6558 Vernon) (.2); update closing checklist regarding closing confirmation (1700 Juneway) (.1); update closing documents in preparation for closing (1700 Juneway) (1.1); exchange correspondence with property management requesting updated financial property reports for closing (1700 Juneway) (.1); review leases, subsidy contracts and update certified rent roll in preparation for closing (1700 Juneway) (2.5); review email from K. Duff regarding incident at property (7110 Cornell) and respond accordingly (.1); exchange correspondence with buyer's counsel producing requested updated rent roll in anticipation of closing (1700 Juneway) (.1).

**Asset Disposition** 

10/7/2020 AEP

1.60 Prepare letter to counsel for purchaser of receivership property (1700 W Juneway) scheduling closing date (.2) and numerous ensuing communications with counsel for purchaser regarding legitimacy of receivership invocation of default for failure to close and alleged obligation to produce additional CHA subsidy-related materials (.2); prepare letter to counsel for purchaser of receivership property (7508 S Essex) scheduling closing date (.2); exchange correspondence with J. Wine regarding status of proceedings in administrative actions, update affected buyers' counsel accordingly (.3), read clarifying e-mail from J. Wine and update affected buyers' counsel accordingly (.3); prepare e-mail to receivership team regarding status of closings, stalled sales, and future marketing on all remaining receivership properties and additional issues to be resolved (.4).

10/8/2020 JR

5.90 Review emails from the title company scheduling department and update files related to closing confirmation of upcoming closings (1700 Juneway, 7201 Dorchester and 6558 Vernon) (.1); review emails from A. Porter regarding pending administrative court actions (.1); finalize closing documents regarding property (7201 Dorchester) (1.2); finalize closing documents regarding property (1700 Juneway) (.4); finalize closing documents regarding property (6558 S. Vernon) (1.4); review email from E. Duff related to May financial reporting and provide requested information (.5); update notice letter to tenants of property (1700 Juneway) (.7); exchange correspondence with buyer's counsel regarding same (1700 Juneway) (.1); update certified rent roll for property (1700 Juneway) (.8); exchange correspondence with property management requesting missing leases in preparation for closing (.2); update notice letter to tenant of property (6558 Vernon) (.3); exchange correspondence with buyer's counsel requesting confirmation of same (6558 Vernon) (.1).

**Asset Disposition** 

10/9/2020 AEP

1.70 Communications with counsel for purchaser of receivership property (7508 S Essex) regarding request for continuance of closing (.1); read e-mail from title underwriter regarding status of recording of release of judgment associated with former receivership property (7748 S Essex), research same, and prepare response to inquiry (.2); research judgments entered against SSDF7 Portfolio 1 properties (7508 S Essex and 7957 S Marguette) for which title indemnities remain outstanding and prepare e-mail to corporation counsel and title company regarding status of payment of same (.3); read e-mail from counsel for purchaser of receivership property (4611 S Drexel) regarding existence of aboveground storage tank, research EquityBuild files and prepare response (.2); read e-mail from counsel for purchaser of receivership property (4611 S Drexel) regarding alleged open violations, research pleadings files, and prepare e-mail to property manager regarding status of alleged continuing violations (.3); read e-mails from counsel for purchaser of receivership property (6250 S Mozart) regarding status of rooftop and commercial tenancies at property, research rent roll and other files for clarifying information, and prepare e-mail to property manager requesting information regarding status of same (.3); read e-mail from corporation counsel regarding status of payment of judgments against SSDF7 Portfolio 1 properties (7508 S Essex and 7957 S Marquette), research public records for evidence of recording of same, and prepare email to title underwriter requesting disbursement of funds held back from closing of receivership property (7748 S Essex) (.3).

**Asset Disposition** 

4.60 Review email from A. Porter requesting to submit water application due to expiration prior to closing (7508 S. Essex) (.1); update closing checklist related to closing date for same (7508 S. Essex) (.1); exchange correspondence with the title company requesting to process water application in preparation for closing (7508 S. Essex) (.1); review email from buyer's management company requesting modifications to tenant notices related to closing (6558 S. Vernon) (.2); exchange correspondence with A. Porter regarding same (7508 S. Essex) (.1); update notice letter to tenants

regarding same (6558 S. Vernon) (.6); review leases and subsidy contracts and update certified rent roll in anticipation of closing (7508 S. Essex) (1.2); exchange correspondence with property management requesting missing items related to same and request additional property financial reports (7508 S. Essex) (.2); review email from broker and provide requested surveys for properties (7024 S. Paxton, 4750 S. Indiana and 1422 E 68th) (.1); review email from leasing manager, review requested leases, update electronic files and update certified rent roll regarding property in anticipation for closing (1700 Juneway) (.7); follow up correspondence with buyer's counsel (A. Jotkus) regarding buyer requested information for closing (7508 S. Essex) (.2); update closing checklist regarding same (7508 S. Essex) (.1); update rent roll regarding same (7508 S Essex) (.6); update electronic files and update notices to tenants regarding same (7508 S Essex) (.3).

#### Asset Disposition

#### 10/10/2020 AEP

7.50 Review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (1700 W Juneway) (1.3); review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (6558 S Vernon) (1.1); review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (7201 S Dorchester) (1.0); research EquityBuild files for information relating to receivership property (7508 S Essex), read all correspondence relating to history of housing court proceedings and efforts to cure violations, and prepare e-mail memorandum to K. Duff (1.5); review closing checklist for receivership property (7508 S Essex), update same consistent with new nominee and management company information received from buyer, order revised survey for inclusion of additional certification parties, and request revised title commitment with disclosure of lis pendens (.4); (cont'd in next entry).

#### **Asset Disposition**

#### **AEP**

(Cont'd from previous entry) Research EquityBuild files for information relating to claims by management company in connection with pre-receivership claims on receivership property (7237 S Bennett), review e-mails regarding additional amounts allegedly due, review pleadings associated with housing court action, review title commitment, review closing checklist, and review proof of claim submitted by property manager, and prepare e-mail to title underwriter requesting approval of proposed order confirming sale free and clear of property manager lien waiver, prepare e-mail to title company requesting revisions to title commitment and copies of special exception documents, and prepare e-mail to buyer's counsel regarding need for lender information, status of housing court proceedings, and anticipated path forward (2.2).

#### Asset Disposition

#### 10/12/2020 AEP

3.30 Teleconference with K. Duff, M. Rachlis, and receivership broker regarding receivership property sales (7109 S Calumet) (1.2), (638 N Avers) (.3), (7237 S Bennett) (.4), and (7508 S Essex) (.3); review releases of mortgage and

assignment of rents received in connection with former receivership property (6356 S California) and forward same to title underwriters for recording (.1): review updated title commitment for receivership property (7508 S Essex) and provide comments regarding lis pendens to title underwriter (.1); review updated title commitment for receivership property (7024 S Paxton), search records for evidence of judgment orders and releases associated with administrative actions added to title commitment, and prepare e-mails to title underwriter and J. Wine regarding existence of original releases (.2); finalize closing figures for receivership properties (6554 S Vernon, 1700 W Juneway, and 7201 S Dorchester) and transmit same to title officer (.3); additional emails with counsel for FannieMae and J. Rak regarding receipt and recording of releases associated with conveyance of former receivership property (6356 S California) (.1); read and respond to e-mail from title underwriter regarding proposed language of order allowing EquityBuild to convey receivership property (7237 S Bennett) free and clear of property manager liens (.2); review amended survey on receivership property (6554 S Vernon) and transmit proposed modifications to surveyor (.1).

**Asset Disposition** 

10/12/2020 JRW

JR

0.40 Exchange correspondence with A. Porter, K. Duff and brokers regarding injunction against property (7508 S Essex).

**Asset Disposition** 

MR 1.50 Attention to (638 Avers) (.3) and (7109 Calumet) (1.2) property issues with broker, A. Porter, K. Duff.

**Asset Disposition** 

4.60 Final review of lien waivers and notices to tenants in preparation for signing (1700 Juneway, 7201 Dorchester 6558 Vernon) (.5); forward same to property management (1700 Juneway, 7201 Dorchester, 6558 Vernon) (.1); final review of broker lien waivers and forward for signature to broker (1700 Juneway, 7201 Dorchester and 6558 Vernon) (.3); review and request updated commission statement from broker (7508 S. Essex) (.2); exchange correspondence with A. Porter and K. Duff regarding upcoming execution of documents related to closings (1700 Juneway, 7201 Dorchester, 6558 Vernon, 7508 S. Essex) (.2); review email from buyer related to requested buyer information and update closing checklist regarding same for properties (4750 S. Indiana and 7024 Paxton) (.3); update power of attorneys for upcoming closings (1700 Juneway, 7201 Dorchester, 6558 Vernon, 7508 S. Essex) (.2); exchange communication with firm regarding same (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (.1); complete tax transfer declaration for property in preparation for closing (6558 S. Vernon) (.5); review closing figures regarding same (6558 S. Vernon) (.2); review most recent rent roll regarding same related to security deposits (6558 S. Vernon) (.1); exchange correspondence with property management requesting confirmation of no security deposits held for tenants related to property (6558 S. Vernon) (.1); final review of closing documents in preparation for signing and closing (6558 S. Vernon) (.3); prepare transfer tax declaration for property (1700 Juneway) (.6); final review of closing

documents (1700 Juneway) (.5); review security deposits for property and update certified rent roll (1700 Juneway) (.2); exchange correspondence with property management regarding same (1700 Juneway) (.1); final review of closing documents (7201 S Dorchester) (.1).

**Asset Disposition** 

10/13/2020 AEP

0.30 Read e-mails from receivership broker regarding communications with prospective purchaser of receivership property (7508 S Essex) concerning outstanding housing court action and prepare e-mail to counsel for purchaser explaining status of compliance with dismissal order, requesting loan amount, attaching updated survey, and providing other closing-related information.

**Asset Disposition** 

JR 6.80 Review emails and save revised surveys to files for properties (7508 S. Essex and 6558 S. Vernon) (.1); review email from property management and provide requested settlement statement from previously sold property (8107 S. Ellis) (.1); review email from broker and provide requested survey for property (7701 S. Essex) (.1); follow up correspondence with property management regarding post-closing reconciliation funds for closed properties (.1); update post-closing reconciliation reports related to all closed properties (.6); draft tenants address labels for notices to tenants for upcoming closings (1700 Juneway, 6558 Vernon, 7201 Dorchester and 7508 S. Essex) (1.1); draft transfer tax declaration form for property in preparation for closing (7508 S. Essex) (.3); draft closing documents for future closings (4750 S. Indiana, 7024 S. Paxton) (4.1); review email from buyer's counsel regarding request to produce prorations for upcoming closings and respond accordingly (.3).

**Asset Disposition** 

10/14/2020 AEP

2.30 Continue reviewing due diligence folders for single-family homes, updating due diligence checklist, reconciling title commitment exceptions to EquityBuild records, and preparing bid procedures to govern submission of offers and selection of winning bidder.

**Asset Disposition** 

AW 0.80 Work with K. Duff and J. Rak on finalization of closing documents for four properties (7508 S. Essex, 1700 Juneway, 6558 S. Vernon and 6217 S. Dorchester).

**Asset Disposition** 

JR
5.90 Prepare closing documents for execution by K. Duff (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (1.2); meeting with A. Watychowicz and K. Duff regarding same (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (.8); prepare notice to tenant letter in preparation for notification of sale of properties (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (1.5); exchange correspondence with buyer's counsel regarding rent and water prorations for upcoming closing (6558 S. Vernon) (.2); request property reports from property management regarding same (6558 S. Vernon) (.1); prepare

reports for production to buyer's counsel (6448 S. Vernon) (.8); exchange communication with K. Duff related to a request to prepare an addendum, draft and forward to K. Duff for property (638 N. Avers) (.1); review email from buyer's counsel requesting updated title commitment and invoice, prepare and produce related to property (1700 Juneway) (.1); review notice for previously sold property and produce to buyer (701 S. 5th) (.1); provide buyer's counsel with requested information related to property regarding tenant information in preparation for sale (1700 Juneway) (.2); communication with K. Duff, A. Porter and accountant regarding W-9 form needed for completion of previously sold property (7300 S. St. Lawrence) (.1); review deed for closing (1700 Juneway) (.1); request property reports from property management in preparation of closing (1700 Juneway) (.1); update certified rent roll regarding same (1700 Juneway) (.5).

#### Asset Disposition

10/15/2020 AEP

5.30 Research EIN for EB South Chicago 3, complete new Form W-9, and transmit same to J. Rak with instructions on finalization and submission (.1); review updated survey and title commitment for receivership property (7508 S Essex), research and confirm property tax payment status, and transmit additional changes to title insurer (.2); review proposed first amendment to purchase and sale agreement relating to receivership property (7508 S Essex), prepare revisions thereto, and return same to purchaser's counsel (.2); review draft rent roll for receivership property (6554 S Vernon), make appropriate revisions, and update settlement statement with buyer credits (.2); teleconference with counsel for purchaser of receivership properties (7600 S Kingston, 7656 S Kingston, 1131 E 79th, and 6250 S Mozart) regarding anticipated timing of rulings on remaining objections to eighth and ninth motions to confirm sales (.2); review judgment order associated with receivership property (6356 S California) and respond to J. Wine regarding status of payment and recording of same (.1); correspondence with J. Wine regarding need for payoff of judgment against receivership property (7024 S Paxton) and need for release of lien (.1); read through all title exceptions and create master list of items needed from City of Chicago and prior encumbrances to ensure conveyance of clean title at closing (1.4); review all building code violation folders to identify all potential judgments pending against single-family homes (.8); review and analyze title histories on all properties subject to title exceptions and create chain of title explanations for use with title underwriter (2.0).

#### **Asset Disposition**

JR
6.00 Follow up correspondence with property management requesting current property reports for closing (6558 S. Vernon) (.1); review same and update certified rent roll for closing (6558 S. Vernon) (.6); exchange correspondence with A. Porter regarding same (6558 S. Vernon) (.3); follow up correspondence with the title company water department regarding status of water applications for upcoming closing (7508 S. Essex) (.1); update property prorations for upcoming closing (1700 Juneway) (.8); attend closing (6558 S. Vernon) (3.5); exchange correspondence with all parties notifying of closing (6558 S. Vernon) (.2); update electronic files regarding same (6558 S. Vernon) (.4).

10/16/2020 AEP

1.00 Teleconference with K. Duff and J. Rak regarding continuance in closing of receivership property (.2), issues associated with single-family home judgments and encumbrances (.5), property tax issues (.1), and status of preparation for closing of tenth tranche of properties (.2).

**Asset Disposition** 

JRW 0.10 Confer with K. Duff regarding publication notice for single family home portfolio.

Asset Disposition

JR 1.40 Work with A. Porter and K. Duff on planning for listing single family portfolio and title exception and insurance issues (.6), closing planning for property (1700 Juneway) (.1), purchase offer on property (1102 Bingham) (.1) and property manager liens and expenses (.2); review tax balances for single family homes (.4).

**Asset Disposition** 

10/19/2020 AEP

0.90 Review all e-mails pertaining to receivership property (1102 Bingham), read marketing materials and status updates, review purchase and sale contract and provide comments regarding same to K. Duff.

**Asset Disposition** 

5.10 Review email from property management and provide closing details of property (7508 S. Essex) (.1); further correspondence with property management requesting property information for closing (7508 S. Essex) (.1); update notice to tenant letters regarding rescheduled closing (1700 Juneway) (.6); telephone call to the Cook County clerk's office regarding information related to the estimate of redemption for property (431 E. 42nd) (.4); exchange correspondence with A. Porter regarding same (431 E. 42nd) (.1); update transfer tax declaration for property (1700 Juneway) (.2); review ledgers and delinquency report and update rent roll regarding same (1700 Juneway) (.9); review single family home due diligence folders and organize in preparation of sharing with interested buyers (2.7).

**Asset Disposition** 

10/20/2020 KMP

0.20 Review online bank records to confirm deposits of proceeds from sales of properties (7201 S Dorchester, 1700 Juneway) and communicate with K. Duff and J. Rak regarding same.

**Asset Disposition** 

AEP

3.70 Correspondence with prospective purchaser of receivership property and title underwriter regarding deletion of unrecorded lease exceptions pertaining to receivership property (1700 W Juneway) based on tenant subordination agreements (.2); correspondence with purchaser's lender and title company regarding identification of nominee and loan amount in connection with receivership property (1422 E 68th) (.1); review settlement statement for

closing of receivership property (7508 S Essex) and prepare e-mail to title agent requesting modifications thereto (.1); remote assistance with closings of receivership properties (7201 S Dorchester and 1700 W Juneway), including rent roll review and analysis, water proration analysis, and reconciliation of final settlement statements (1.5); review all housing court and administrative orders circulated by J. Wine, updated closing checklists, and distribute same to counsel for purchasers (.5); research closing documents, e-mail correspondence, and Cook County tax records and reconcile escrow refund check associated with closing of conveyance of receivership property (701 S Fifth) (1.3).

#### **Asset Disposition**

10/20/2020 JR

6.60 Exchange correspondence with property management requesting property reports for closings (1700 Juneway and 7201 S. Dorchester) (.1); exchange correspondence with A. Porter regarding closings (1700 Juneway and 7201 S. Dorchester) (.5); attend closings of properties (1700 Juneway and 7201 S. Dorchester) (5.8); exchange correspondence with K. Duff, K. Pritchard and J. Wine confirming closed properties and anticipated net proceeds (1700 Juneway and 7201 S. Dorchester) (.1); exchange correspondence with property management regarding same (1700 Juneway and 7201 S. Dorchester) (.1).

#### **Asset Disposition**

10/21/2020 KMP

0.50 Review online bank records to confirm deposits of proceeds from sales of properties (7201 S Dorchester, 1700 Juneway) and communicate with K. Duff and J. Rak regarding same (.2); prepare deposit documentation and transmittal to bank regarding return of unused escrow funds for sold properties (701 S 5th, 8432 S Ellis) (.3).

**Asset Disposition** 

JR 5.80 Exchange correspondence with the closer at title company regarding authorization disbursement of funds related to closings (1700 Juneway and 7201 S. Dorchester) (.1); review final waiver of lien for property management and notices to tenants (.2); request execution of same from property management (7508 S. Essex) (.1); update transfer tax declaration form with the correct dates relating to same (7508 S. Essex) (.1); review ledgers, delinquency report and update certified rent roll regarding upcoming closing (7508 S. Essex) (.7); review leases regarding same (7508 S. Essex) (.2); draft closing documents for property (816-22 E. Marquette) (4.0); exchange correspondence with buyer requesting updated due diligence documents for properties (7024 S. Paxton and 4750 S. Indiana) (.1); request same from property management (.1); exchange correspondence with broker requesting commission statements on 14 properties subject to tenth motion (.1); review email from property management and provide requested information related to property (7201 S.

**Asset Disposition** 

Dorchester) (.1).

10/22/2020 KMP

**AEP** 

0.20 Review online banking records relating to property (701 S 5th) to confirm receipt of all unused escrow funds subsequent to closing and communicate with K. Duff and A. Porter regarding same.

**Asset Disposition** 

8.80 Read through title commitment for single-family homes, record every special exception requiring deletion prior to closing, research chain of title for all properties showing title vested in non-receivership entities (7933 S Kingston, 8104 S Kingston, 8524 S Rhodes, 310 E 50th, and 6807 S Indiana), and prepare comprehensive memorandum to title underwriter requesting approval of proposed courses of action for clearing remaining exceptions (6.5); record remaining unresolved title exceptions associated with properties in tenth sales tranche (4317 S Michigan, 4533 S Calumet, 4750 S Indiana, 6217 S Dorchester, 7024 S Paxton, and 7701 S Essex), begin researching same and preparing action plan for discussion with title underwriter (2.3).

**Asset Disposition** 

AW 0.90 Study draft response to motion to reconsider and communicate with M. Rachlis regarding revisions.

**Asset Disposition** 

JR 7.30 Update single family homes documents (.5); exchange correspondence with A. Porter regarding single family homes (.1); review email from buyer's counsel regarding request for information related to closing (7508 S. Essex) (1.); exchange correspondence with A. Porter regarding same (7508 S. Essex) (.2); review email from property management and provide requested buyer information for properties that sold (1700 Juneway and 7201 S. Dorchester) (.1); update certified rent roll for property (7508 S. Essex) and provide requested prorations to buyer's counsel (.3); review email from A. Porter regarding requested information from buyer's counsel related to property (2800 E. 81st) and respond accordingly (.2); review due diligence documents requested and further correspond with property management requesting same (2800 E. 81st) (.3); draft closing documents for property in anticipation of closing (431 E. 42) (1.8); review leases related to property (816-22 S. Marquette), review lease terms and security deposits and update certified rent roll in anticipation of closing (816-22 S. Marquette) (.9); review documents requested for closing (7508 S. Essex) from property management and update electronic files (.2); forward same to buyer's counsel regarding property (7508 S. Essex) (.1); update notice to tenants in anticipation of closing (816-22 E. Marquette) (.2); draft closing documents for property (4533-47 S. Calumet) (1.5); draft rent roll regarding same (5433-47 S. Calumet) (.6); review lender objections to the 10th motion and exchange correspondence with A. Porter regarding submitting water applications for processing of various properties not subject to lender objections (.2).

**AEP** 

10/23/2020 KMP

0.40 Review online banking records to identify account numbers for distribution of proceeds for next tranche of properties to be offered for sale, and communicate with bank representative regarding establishing additional accounts in connection with same.

**Asset Disposition** 

3.20 Read and respond to e-mail from counsel for purchaser of receivership properties (4750 S Indiana and 7024 S Paxton) regarding existence of special exceptions on corresponding title commitments and receivership plans for deleting said exceptions at closing (.2); read objection to tenth motion to confirm sales and proofread, reconcile, and revise proposed order partially granting tenth motion as to property sales eliciting no objection (1.8); preliminary communications with alternative title company regarding potential issuance of insurance over special exceptions raised by current insurer (.3); teleconference with K. Duff, receivership broker, and counsel for special servicer regarding status of preparation of marketing of single-family home portfolio, including title issues, sales contract issues, due diligence issues, and marketing issues (.5); prepare email to counsel for all purchasers of receivership property subsumed within tenth motion to confirm regarding status of ruling on motion and anticipated timing of closings (.4).

**Asset Disposition** 

JRW 0.90 Prepare order partially granting tenth sales motion (.4); related communications with A. Porter and revisions to same (.3); draft cover letter to court regarding proposed order (.2).

**Asset Disposition** 

JR 5.10 Exchange correspondence with broker regarding properties subject to lender objections (.1); draft closing documents for property (4533-47 S. Calumet) (1.6); review email from buyer's counsel and provide requested documents for property (7508 S. Essex) (.2); exchange correspondence with property management requesting current property reports requested by buyer's counsel (7508 S. Essex) (.1); review email from buyer's counsel requesting commercial leases for property (6250 Mozart), review leases and provide same to buyer's counsel (.2); review commission statements received from broker related to the 10th motion, update electronic files, closing checklists and closing figures for properties (431E. 42nd, 4533 S. Calumet and 816 E. Marquette) (.6); request buyer information from buyer's counsel on various properties in preparation for submission of water applications (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.6); request title commitment updates regarding same (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.5); prepare water applications for properties in preparation for closings (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (1.2).

**Asset Disposition** 

10/25/2020 AEP

1.70 Review and update closing checklist for receivership property (431 E 42nd), confirm deadline for tax redemption, prepare e-mail to title company scheduling closing, prepare e-mail to buyer's counsel regarding scheduling of

closing, and prepare e-mail to J. Wine regarding order partially granting tenth motion to confirm sales (.4); review and update closing checklist for receivership property (4533 S Calumet), check status of payment of second installment 2019 property taxes and read e-mails from buyer's counsel regarding nominee and lender information, and prepare e-mail to title company requesting revisions to title commitment (.4); review and update closing checklist for receivership property (816 E Marquette), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2); review and update closing checklist for receivership property (7442 S Calumet), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information and describing restriction subject to which property will be conveyed (.3); review and update closing checklist for receivership property (1422 E 68th), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2); review and update closing checklist for receivership property (7701 S Essex), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2).

**Asset Disposition** 

10/26/2020 KMP

0.30 Revise chart regarding next tranche of properties to be offered for sale to identify account numbers for proceeds of same, and communicate with J. Rak regarding same.

Asset Disposition

AEP

2.60 Read e-mails from prospective purchasers of receivership properties (816 E Marquette, 7701 S Essex and 7742 S Calumet), update closing checklists accordingly, and request revised title commitments (.5); teleconference with receivership broker regarding status of negotiations over closing credit to purchaser of receivership property (7327 S Bennett) and issues associated with closing of all remaining properties in pipeline (.3); research files and public records and prepare hold harmless indemnity request letter to prior title insurer in connection with remaining clouds on title to receivership property (4533 S Calumet) (1.4); prepare correspondence to outside counsel for City of Chicago requesting information regarding status of payment of judgment recorded against prior owner of receivership property (7701 S Essex) (.2); prepare correspondence to corporation counsel regarding status of enforcement of injunction order entered against prior owner of receivership property (7701 S Essex) (.2).

Asset Disposition

JRW 0.40 Revise proposed order on tenth sales motion (.3) and cover email to court clerk regarding proposed order (.1).

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

JR

1.60 Review email from buyer's counsel regarding requested buyer information for property (4533 S. Calumet) (.1); update water application and closing checklist regarding same (4533 S. Calumet) (.2); exchange correspondence with the title company regarding same (4533 S. Calumet) (.1); review email from property management regarding buyer information and provide same for closed property (7051 S. Bennett) (.1); review email from title company regarding water applications and provide requested information regarding same (816 S. Marquette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.3); review email from K. Pritchard regarding requested bank account information for future closings and update closing documents regarding same (816 S. Marquette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd, 1422 E. 68th, 2800 E. 81st, 4611 S. Drexel, 4750 S. Indiana, 6217 S. Dorchester, 7024 S. Paxton, 7255 S. Euclid, 7840 S. Yates) (.8).

#### Asset Disposition

#### 10/27/2020 AEP

2.00 Prepare updated closing costs for receivership property (638 N Avers) (.1); review proposed order partially granting tenth motion to confirm and provide comments to K. Duff (.1); read e-mail from counsel for purchaser of receivership property (431 E 42nd) and finalize closing figures (.2); teleconference with J. Rak regarding status of preparation for closings of receivership properties (7701 S Essex, 7742 S Calumet, and 816 E Marquette) (.3); read order granting remainder of eighth and ninth motions to confirm sales and peruse notice of appeal and motion to stay filed by certain lenders (.3); prepare e-mail to counsel for purchasers of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston, 1131 E 79th, and 6250 S Mozart) regarding outcome of judicial rulings and effect of motion to stay pending appeal (.3); teleconference with potential new title company regarding impasses with current title company over deletion of special exceptions on various receivership properties (7237 S Bennett and single-family home portfolio) (.7).

#### **Asset Disposition**

JR 5.10 Review email from title company regarding water applications and update closing checklist relating to properties (816 S. Marguette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 431 E. 42nd) (.2); review email from property management regarding closing (7508 S. Essex) and update files with subsidy agreement (.1); forward same to buyer's counsel (.1); review emails related to title commitments and exchange correspondence with lender requesting lender requirements for further updates related to properties (7442 S. Calumet, 7701 S. Essex) (.5); update closing checklists regarding same (7442 S. Calumet, 7701 S. Essex) (.2); exchange correspondence with property management requesting updated property reports for closing (7508 S. Essex) (.1); review requested reports and update certified rent roll for same (7508 S. Essex), update electronic files (.4); review email from broker and respond regarding property keys coordination for closing (7508 S. Essex) (.1); draft documents in preparation for closing of property (7508 S. Essex) (1.0); telephone call with A. Porter

regarding status of upcoming closings and plan of action (.4); exchange correspondence with K. Duff and A. Porter regarding execution of closing documents (.2); review emails regarding scheduling of various closings and update closing checklist (.5); exchange correspondence with property management requesting updated rent roll reports for upcoming closings (7600 Kingston, 7656 S. Kingston) (.1); exchange correspondence with broker requesting commission statement for upcoming closings (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.2); prepare water applications for properties (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.8); submit same to the title company for processing (6949 S. Merrill, 7600 Kingston and 7656 S. Kingston) (.2).

**Asset Disposition** 

10/28/2020 KMP

0.20 Review online bank records to confirm receipt of proceeds for sold property (7508 S Essex) and communicate with J. Rak regarding same.

**Asset Disposition** 

**AEP** 

1.60 Review corresponding title commitments and prepare proposed order granting eighth motion to confirm sales (.6); remote assistance with closing of receivership property, including negotiations over encroachment endorsements, review and analysis of certified rent roll and computation of prorations and credits, and review of final settlement statement (1.0).

**Asset Disposition** 

**JRW** 

0.80 Work with A. Porter on preparation of proposed orders granting eighth and ninth sales motions (.2); telephone conference with claimant's counsel regarding property closings and communicate with team regarding response to same (.3); draft email to court clerk regarding entry of proposed orders and related email exchange (.3).

**Asset Disposition** 

JR

5.80 Exchange correspondence with property management requesting updates for closing (7508 S. Essex) (.3); update certified rent roll regarding same (7508 S. Essex) (.5); attend closing for property (7508 S. Essex) (4.2); notify all parties on confirmation of closing and net proceeds of sale (7508 S. Essex) (.2); review email from property management related to request for property information and respond accordingly (2800 E. 81st) (.2); prepare power of attorney for various properties (.4).

**Asset Disposition** 

10/29/2020 AEP

1.00 Review and analyze settlement statement for closing of sale of receivership property (431 E 42nd) (.1); communications with former title company regarding need for hold harmless letter associated with prospective conveyance of receivership property (.1); review and analyze revised title commitments in connection with prospective sales of receivership properties (4533 S Calumet and 816 E Marquette) and communicate with purchasers' counsel to confirm accuracy of lender information (.2); prepare proposed order granting ninth motion to confirm sales in remaining part in connection with prospective sales of receivership property (1131 E 79th and 6250 S Mozart) (.6)

10/29/2020 AW

0.30 Revisions to draft order granting eighth motion to confirm sales and email J. Wine regarding requested revisions.

**Asset Disposition** 

JR

5.30 Exchange correspondence with the title company requesting estimate of redemption for closing (431 E. 42nd) (.2); telephone call to the Cook County Clerk's office regarding same (431 E. 42nd) (.3); prepare draft closing documents for property (6949 S. Merrill) (3.1); follow up correspondence with property management requesting updated rent rolls in preparation for closings (7600 and 7656 S. Kingston) (.1); review and update electronic files regarding same (7600 and 7656 S. Kingston) (.2); exchange correspondence with property management providing closing confirmations and request current rent rolls in preparation for closings (816 S. Marquette, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); update closing figures in anticipation for closing (6949 S. Merrill) (.3); draft closing documents for property (7600 S. Kingston) (.9).

**Asset Disposition** 

10/30/2020 AEP

4.80 Review title commitments associated with receivership properties (7600 S Kingston and 7656 S Kingston), research current property tax liability and status of release of judgments listed as special exceptions, and prepare e-mail to title insurer requesting appropriate revisions (.4); review latest revisions to title commitment on receivership property (4611 S Drexel) and make appropriate modifications thereto (.1); teleconference (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) regarding potential settlement of dispute over earnest money following judicial decision confirming eighth motion to confirm sales and implications of regulatory agreement recorded against receivership property (7024 S Paxton) (.6); research files for information pertaining to judgment order recorded against receivership property (4611 S Drexel) and respond to e-mail inquiries from J. Wine regarding options for securing removal of encumbrance (.3); additional correspondence with J. Wine regarding copy of judicial order on receivership property (4611 S Drexel) (.1); additional correspondence with J. Wine regarding potential negotiation of resolution of administrative proceedings pending against receivership property (.1); teleconference with K. Duff and receivership broker regarding eighth motion to confirm and status of sales of all other as-yet unconveyed properties (1.3); prepare detailed e-mail to prospective new title insurer regarding (property manager refusal to deliver lien waiver at closing of sale of) receivership property (7237 S Bennett) (.6); review and analyze chain of title of receivership property (4317 S Michigan) and prepare e-mail to prospective new title insurer demonstrating basis for issuing commitment without raising exceptions appearing on current draft of commitment (1.3).

JR

10/30/2020 AW

0.40 Communicate with K. Duff regarding objections to ninth and tenth sale motions.

**Asset Disposition** 

6.20 Review emails from property management and update electronic files with requested due diligence documents in anticipation of closings (816 S. Marquette, 7024 S. Paxton, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.4); draft closing documents for property (7600 S. Kingston) (1.9); review email from buyer's counsel related to lender information for upcoming closings (7600 and 7656 S. Kingston) and update electronic files regarding same (.2); draft closing documents for property (7656 S. Kingston) (1.9); review email from title company regarding requested county information for upcoming closings and respond accordingly (.2); review orders entered granting 8th and 10th motion to approve sale and update electronic files relating to same (.3); update closing documents regarding anticipated closing (431 E. 42nd) (.3); telephone call with A. Watychowicz regarding upcoming closings and scheduling of execution of documents on various properties (.3); review email from buyer counsel regarding buyer information and update closing checklist (431E. 42nd) (.3); review email from buyer's counsel and update closing checklist regarding same (6949 S. Merrill) (.2); exchange correspondence with A. Porter regarding upcoming rescheduling of closings of properties (6949 S. Merrill, 7600 Kingston and

**Asset Disposition** 

7656 S. Kingston) (.2).

SUBTOTAL: 181.20 40362.00]

**Business Operations** 

10/1/2020 KMP

0.40 Communicate with property manager and EB team regarding electronic payment notices from utility company (.2); confer with A. Watychowicz regarding status of upcoming filings (.2).

**Business Operations** 

JRW 1.40 Exchange correspondence with K. Duff and A. Porter regarding pending administrative proceedings (7109 S Calumet) and related research regarding same (.4); exchange correspondence with property manager (M. Abraham) regarding scheduling of inspections (7201 S Constance, 7600 S Kingston, 7237 S Bennett, 638 N. Avers) (.2); exchange correspondence with City of Chicago regarding upcoming housing court matters (6217 S Dorchester, 7237 S Bennett, 638 N. Avers, 7600 S Kingston) and forwarding evidence of property sales (7300 S St. Lawrence, 7201 S Constance, 7110 S Cornell)

(8.)

**Business Operations** 

10/2/2020 ED

2.40 Further review and analysis of drafts of May accounting reports (9); prepare analysis of reimbursable amounts due from proceeds of sold properties (.4); review of J. Rak comments identifying discrepancies in certain draft reports and consult underlying financial records and correspondence (.8) and email correspondence to J. Rak regarding same (.1); draft email correspondence to accountant requesting review of remaining discrepancies (.2).

10/5/2020 JRW

1.60 Exchange emails with city attorney regarding entry of order (7546 Saginaw) (.2); related email to property manager regarding payment of same (7546 Saginaw) (.1); investigate administrative proceeding against property (6437 S Kenwood) (.3); study notices of violation, evidence in file from property manager's redress of violations in and counts in two cases against property (7109 S Calumet) (.5); review new orders in administrative matters (7656-58 S Kingston, 7109 S Calumet, 7600-10 S Kingston, 416-24 E 66th St) and work with K. Pritchard to update hearing docket (.5).

**Business Operations** 

10/6/2020 ED

0.40 Prepare summary of accounting reports prepared and delivered in third quarter (.1); draft and send email correspondence to accountant regarding discrepancies in May reports requiring revision (.3).

**Business Operations** 

JRW 0.80 Research regarding status of administrative and housing court proceedings (4611 S Drexel, 6217 S Dorchester, 7255 S Euclid, 6250 S Mozart, 7109 S Calumet, 1131-41 E 79th Pl., 638 N. Avers) and related exchange of correspondence with claimant's counsel (.3); review orders in administrative proceedings (4520 S Drexel, 6250 S Mozart, 6951 S Merrill) and update docket regarding same (.4); exchange correspondence with K. Duff and A. Porter regarding matter relating to property (7114 S Cornell) (.1).

**Business Operations** 

10/7/2020 KMP

0.30 Prepare form for wire transfer to financing company for payment of insurance premium financing installment and communications with K. Duff and bank representatives regarding same.

**Business Operations** 

ED 1.80 Review revised May reports (.4) and email correspondence to accountant with additional comments and corrections (.2) and requesting analysis of remaining rent restoration and reimbursable amounts by properties. (.2); final review of May reports (1.0).

**Business Operations** 

JRW 2.10 Correspond with property manager regarding potential resolution of violation (6250 S Mozart) and related exchange with A. Porter and K. Duff (.3); telephone conference with city counsel regarding housing court matters (7237 S Bennett, 638 N. Avers, 7600 S Kingston, 6217 S Dorchester, 7300 S St Lawrence, 7201 S Constance and 7110 S Cornell) and related follow up correspondence regarding continuation and dismissal orders (.9); prepare correspondence to ownership dispute division regarding pending administrative matter (7750 S Muskegon) (.2); research regarding corporate issue (.5); review administrative court notices (6951 S Merrill, 6250 S

Mozart) and related exchange with A. Watychowicz (.1); exchange correspondence with property manager regarding scheduling of inspection (6217 S Dorchester) (.1).

**Business Operations** 

10/8/2020 ED

4.00 Review and revise analysis of remaining rent restoration and reimbursement amounts due as of May 31, 2020 (1.5); draft correspondence to lender's counsel to transmit accounting reports, including explanations of insurance expense for all unsold properties and inspection expenses for certain properties (.9); email correspondence with accountant and J. Rak regarding apparent discrepancy in one draft report (8432 S Essex) and review of corrected statement (.2); review of premium finance agreements executed in connection with renewals of property and liability insurance (.3); prepare analysis of restoration amounts due from sold properties (.6); review and organize financial reporting data necessary for preparation of June accounting reports (.5).

**Business Operations** 

**JRW** 

2.10 Exchange correspondence with A. Porter and counsel for buyers regarding housing court matters (7201 S Constance, 7110 S Cornell and 7300 S St Lawrence) (.4); review correspondence regarding attorney's lien notice (7114 S Cornell) and related communications with K. Duff and A. Porter and voice message to claims counsel (.5); confer with A. Watychowicz regarding continuation orders in administrative matters (6949 S Merrill, 4520 S Drexel, 6250 S Mozart) (.2); review draft pleadings and communicate with K. Duff and E. Duff regarding property manager's communication regarding accounts payable and restoration motion (.2); exchange correspondence with city counsel regarding default judgments (431 E 42nd PI) and related review of online database and email exchange with A. Porter (.3); communicate with A. Porter and K. Duff regarding settlement (431 E 42nd Pl) (.2); exchange correspondence with K. Duff and A. Watychowicz regarding claimant communication (1102 Bingham) and related voice message to counsel (.3).

**Business Operations** 

10/9/2020 KMP

1.10 Communicate with insurance broker regarding sold properties (.2); communicate with K. Duff regarding additional security installation (638 N. Avers) (.1); study property manager's reporting for September and review backup documentation on owner portal relating to same (.8).

**Business Operations** 

ED

1.10 Transmit May accounting reports to lenders' counsel (.6); email correspondence with accountant regarding analyses of restoration and reimbursement amounts (.2) organize financial data for use in preparing accounting reports (.3).

10/9/2020 JRW

1.20 Telephone conference with law firm and related correspondence regarding tax matter (1102 Bingham) (.2); exchange correspondence and records with A. Porter regarding lis pendens and injunction in order dismissing housing court matter (7508 S Essex) (.4) and related correspondence to corporate counsel (.2); exchange correspondence with city's ownership dispute division regarding dismissal order (7750 S Muskegon) (.2); settlement proposal from collection counsel and related exchange of correspondence with A. Porter regarding motion to set aside default judgments (.2).

**Business Operations** 

AW 1.10 Prepare financial statements on property by property basis for service and email E. Duff regarding reports.

**Business Operations** 

10/12/2020 KMP

0.40 Prepare form for funds transfer to property manager for additional security installation (at 638 N. Avers) and communicate with K. Duff and bank representatives regarding same.

**Business Operations** 

JRW 1.00 Begin drafting motions to vacate default judgments (431 E 42nd Pl.) (.3); review files regarding upcoming administrative hearings (6437 S Kenwood, 5001 S Drexel, 6356 S California, 5618 S MLK) (.4); correspondence to A. Porter and K. Duff regarding upcoming administrative hearing (6437 S. Kenwood) (.1); review correspondence regarding administrative matters (7024 S Paxton) and related exchange with A. Porter regarding release of lien (.2).

**Business Operations** 

10/13/2020 KMP

0.70 Follow up communications with K. Duff and bank representatives regarding funds transfer to property manager for additional security installation at property (638 N Avers) (.2); confer with K. Duff regarding renewal of security installation at another property (7237 S Bennett) and prepare request form to wire funds for same to property manager (.2); research regarding property entity name (638 N Avers) for insurance settlement payments and communicate with K. Duff and A. Watychowicz regarding same (.3)

**Business Operations** 

ED 0.70 Prepare analysis of reimbursement amounts due from sold properties (.4); telephone conference with K. Duff to discuss property financial reporting (.3).

**Business Operations** 

JRW 1.00 Confer with collections firm regarding property tax lawsuit (1102 Bingham), related review of records and update to K. Duff and A. Porter (.7); communicate with K. Duff and E. Duff regarding accounts payable to property manager (.1); confer with A. Porter regarding dismissal from administrative matter (6437 S Kenwood) (.1); exchange correspondence with A. Porter regarding housing court matter (7508 S Essex) (.1).

10/13/2020 AW

0.40 Locate detailed info regarding entity and email K. Pritchard regarding same (.1); research regarding Houston litigation and email J. Wine regarding findings (.3).

**Business Operations** 

10/14/2020 KMP

0.30 Follow up communications with K. Duff and bank representatives regarding funds transfer to property manager for additional security installation at property (7237 S Bennett).

**Business Operations** 

JRW

2.90 Correspond with City counsel regarding extension of compliance deadline in housing court matter (7508 S. Essex) and entry of orders in various matters (.3); correspondence to City of Chicago Ownership Dispute unit regarding pending administrative matter (6437 S Kenwood) (.2); prepare for conference with counsel regarding tax matter (1102 Bingham) and related review of file tax statement and payment plan (1.1); telephone conference with counsel in Texas tax matter (1102 Bingham) (.2) and related review of complaint and summary to K. Duff and A. Porter (.2); exchange correspondence with counsel for Harris County (1102 Bingham) regarding violation of order appointing receiver, potential motion for rule to show cause, and nonsuit of action and related update to team (.5); correspond with A. Porter and property manager regarding payment of judgment lien (7024 S Paxton) and related review of prior notice and correspondence regarding second lien on property (.2); email to property manager regarding payment of judgment order (7546 S Saginaw) and related exchange with J. Rak (.1); correspondence to collections counsel regarding release of second lien on property (7024 S Paxton) (.1).

**Business Operations** 

AW 0.40 W

0.40 Work with K. Duff on notice of receivership for accountant and serve notice via mail and email.

**Business Operations** 

10/15/2020 JRW

0.90 Review order of nonsuit for tax action (1102 Bingham) (.1); exchange correspondence with collections counsel regarding lien release (7024 S Paxton) and related review of release and update to A. Porter and J. Rak (.2); exchange correspondence with A. Porter regarding unpaid judgment (6356 S California) (.2); correspond with City of Chicago Ownership Dispute division and A. Porter regarding evidence of payment (6437 S Kenwood) (.1); confer with J. Rak regarding property manager's lien waiver for property (7051 S Bennett) (.1); review prior correspondence and related analysis to K. Duff regarding property manager accounts payable (7051 S Bennett) (.2).

10/16/2020 JRW

0.40 Confer with property manager regarding accounts payable (.2) and related telephone conference with K. Duff restoration motions (.2).

**Business Operations** 

10/19/2020 KMP

0.40 Review and analyze property manager's request for funds for utility and other expenses at certain properties (638 N Avers, 1401 W 109th, 7201 S Dorchester) and communicate with K. Duff and E. Duff regarding same.

**Business Operations** 

AW 0.20 Communicate with J. Wine regarding previously filed motions to strike, review files, and communicate with counsel regarding results.

**Business Operations** 

10/20/2020 KMP

1.10 Prepare forms for funds transfer in connection with property manager's request regarding utility and other expenses at certain properties (638 N Avers, 1401 W 109th, 7201 S Dorchester) and communicate with K. Duff and bank representatives regarding same (.4); communicate with property manager to confirm funds transfer (.2); communicate with E. Duff regarding spreadsheet and confirmation of funds transfers relating to restoration (.2); communicate with insurance broker to advise of recently closed properties and request information relating to premium financing (.2) and confer with K. Duff regarding same (.1).

**Business Operations** 

ED 1.80 Telephone conference with accountant regarding updated process for preparation of accounting reports (.3); prepare draft of email correspondence to lenders' counsel regarding completion of rent restoration and future reporting from receivership, including attachments describing funds transfers and confer with K. Duff regarding same (.8); review and analysis of schedules of rent restoration payments made pursuant Order approving Second Motion for Restoration of Funds Expended for the Benefit of Other Properties (.7).

**Business Operations** 

JRW 1.80 Communicate with City counsel regarding extension of compliance date (7508 S Essex) and entry of orders (.2); review housing court orders (7237 S Bennett, 7110 S Cornell, 7300 St Lawrence, 638 N Avers, 7201 S Constance, 7600 S Kingston, 6217 S Dorchester) and update records and docket (.7); correspondence to claimant's counsel regarding status of administrative proceedings (6217 S Dorchester, 6250 S Mozart, 7109 S Calumet, 638 N. Avers) (.4), review new administrative court orders (4520 S Drexel, 7110 S Cornell, 7750 S Muskegon) and release of lien (7024 S Paxton) and related communication with K. Duff and A. Porter (.5).

**Business Operations** 

AW 0.20 Attention to notice regarding other lawsuit and communicate with K. Duff regarding filed claim and counsel involvement.

**Business Operations** 

10/21/2020 ED

0.60 Preparation for call with accountant regarding monthly review of financial reporting from property manager (.2), and related email correspondence (.3); confer with A. Watychowicz to request document relating to properties to be discussed (.1).

**Business Operations** 

AW 0.30 Call with J. Wine regarding access to online platforms (.2); communicate with K. Duff regarding transcripts of various proceedings (.1).

**Business Operations** 

10/23/2020 KMP

0.30 Review invoices and statement of loss from loss manager regarding property damage settlement (638 N Avers) and communicate with K. Duff regarding same.

**Business Operations** 

JRW 0.30 Exchange correspondence with A. Porter regarding code violation (4533 S Calumet) (.2); exchange correspondence with property manager regarding water meter notice (7840 S Yates) (.1).

**Business Operations** 

10/26/2020 KMP

0.80 Prepare form to request transfer of funds for loss management services relating to EB property (638 N Avers), and communicate with bank representatives and K. Duff regarding same (.4); communicate with loss management representative to request a comprehensive statement of loss relating to the property (638 N Avers) (.2); communicate with insurance broker regarding issues relating to reduction in premium funding payments as a result of property sales (.2).

**Business Operations** 

ED 0.70 Email correspondence with accountant and J. Rak regarding development of process for updating financial reporting to lenders and for use in management of portfolio by Receiver.

**Business Operations** 

JRW 1.20 Email exchange with corporation counsel regarding motions to set aside default judgments (431 E 42nd Pl.) (.2); prepare and file motions to set aside with supporting documentation (431 E 42nd Pl.) (.8); update team regarding general order from City of Chicago Department of Administrative hearings regarding hearings in Department of Buildings matters (.2).

**Business Operations** 

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

ED

10/27/2020 KMP

0.50 Further communication with loss management representative regarding comprehensive statement of loss and pending insurance payments relating to EB property (638 N Avers) (.2); communicate with K. Duff regarding issues relating to payment of expenses relating to same (638 N Avers) (.1); communicate with K. Duff regarding remaining transfers relating to second restoration motion in light of Court's order granting same (.2).

**Business Operations** 

1.70 Conference call with accountants and J. Rak to discuss preparation of property financial reporting for dissemination to lenders' counsel and tracking of restoration amounts to be reimbursed from proceeds of property sales (1.3); preparation for same (.2); email correspondence with property manager regarding basis of reporting in monthly property financial reporting (.2).

**Business Operations** 

JRW 0.40 Review lien notice (4611 S. Drexel) and related research and exchange of correspondence.

**Business Operations** 

10/28/2020 KMP

0.40 Further communication with K. Duff regarding remaining transfers relating to second restoration motion in light of Court's order granting same (.1); review property manager's financial records to determine current property (6250 S Mozart) net income and communicate with K. Duff regarding same (.3).

**Business Operations** 

ED 0.20 Email correspondence with K. Duff regarding calculation of restoration owed from property (638 N Avers) for purposes of preparing statement of estimated closing costs.

**Business Operations** 

JRW

1.60 Exchange correspondence with corporation counsel regarding Department of Sanitation matters (431 E. 42nd Pl) (.3); attention to drafting proposed order granting remainder of restoration motion and related communications regarding exhibit to same (.6); correspond with A. Porter regarding lien notice and judgment order (4611 S Drexel) (.1); review new administrative hearing orders (8209 S Ellis) and confer with A. Watychowicz regarding same (.2); exchange correspondence with property manager and K. Duff regarding repairs to property (7840 S Yates) (.4).

**Business Operations** 

10/29/2020 KMP

0.20 Communication with K. Duff and E. Duff regarding adjustments to insurance premium financing installments in light of various property sales.

**Business Operations** 

10/30/2020 KMP

0.80 Communication with insurance broker regarding updated payment schedules for insurance premium financing installments in light of various property sales (.2); prepare form for funds transfer to premium

|--|

financing company for installment payment on property insurance, and communicate with K. Duff and bank representatives regarding same (.4); communicate with K. Duff regarding preservation of records (.2).

**Business Operations** 

10/30/2020 ED

0.20 Email correspondence to accountants to supply background for preparation of accounting reports, and review of related financial information.

**Business Operations** 

**JRW** 

1.60 Research administrative order (4611 S Drexel) and related exchange of correspondence with property manager and A. Porter (.2); exchange correspondence with A. Porter regarding escrow for administrative judgment (431 E 42nd Pl) (.1); exchange correspondence regarding notice of lien (4611 S Drexel) (.1); telephone conference with collections counsel regarding recording of lien and judgment order (4611 S Drexel), draft correspondence regarding same, and related communications with K. Pritchard and K. Duff regarding prior notice (1.2).

**Business Operations** 

SUBTOTAL: [48.20 13324.00]

#### Case Administration

10/5/2020 AW 0.90 Prepare pleadings and request update to Receivership website.

Case Administration

10/6/2020 KMP 0.20 Work with IT consultant to add recent pleadings to Receiver's web page.

Case Administration

10/8/2020 AW

0.20 Attention to order entered by administrative court (6949 S Merrill) and update docket (.1); attention to entered order regarding tenth sale motion and update docket (.1).

Case Administration

10/13/2020 AW

0.20 Attention to mortgagees' motion to reconsider and update docket (.1); attention to Judge Lee's order regarding same, communicate deadline to counsel, and update docket (.1).

Case Administration

10/19/2020 AW

1.00 Communicate with J. Wine regarding revisions to receivership web page (.1); prepare pleadings and request update to receivership web page (.7); attention to previously posted pleadings and communicate with IT consultant regarding proposed revisions (.2).

Case Administration

<u>Date Indiv H</u>	ours Description
10/20/2020 AW	0.20 Attention to orders from municipal division and communication regarding deadlines for inspections and docket same.
	Case Administration
10/21/2020 KMP	0.50 Review employee and payroll documents to confirm status of former EB employee and communicate with K. Duff and A. Watychowicz regarding same (.3); renew USPS forwarding of EB mail (.2).
	Case Administration
10/23/2020 AW	0.20 Work on order granting tenth motion to approve sale and communicate with J. Wine regarding same.
	Case Administration
10/27/2020 AW	1.00 Attention to entered orders regarding third party request for relief and approving eighth and ninth sale motions and notify counsel of same (.1); request upload of pleadings to receivership web page (.7); attention to pleadings relating to newly filed appeal and forward same to counsel (.2).
	Case Administration
10/29/2020 AW	0.20 Attention to annual reports for entities (6217 S Dorchester and 4611-17 S Drexel) and update docket (.1); request update to receivership web page (.1).
	Case Administration
ΓAL:	[ 4.60 644.00]

#### Claims Administration & Objections

10/1/2020 JRW

8.10 Study and revise multiple drafts of response to motion for priority determination and turnover of funds (1.3); telephone conference with claimants' counsel regarding joint motion regarding pending matters for disposition (.2); revise and finalize same and related email exchanges with claimants' counsel, EB team and SEC (.9); prepare list of scheduling issues for claims process (.5); telephone conference with M. Rachlis and K. Duff regarding joint report on pending motions, turnover motion, standard discovery and related position statement (1.0); review of briefing on claims motion (.4); continue working on motion setting forth participants' discovery positions (1.6); study latest draft of standard discovery requests to investors from institutional lenders' counsel and related analysis and communications with M. Rachlis and K. Duff (1.7); prepare exhibits to discovery motion (.5).

10/1/2020 AW

0.70 Respond to claimant's email and voice message regarding discovery (.1); attention to first draft of response to motion for turnover and begin proofreading same (.4); attention to email exchanges with lenders' counsel regarding discovery motion and joint status on pending motions (.2).

Claims Administration & Objections

MR

7.40 Review and revise several drafts of claims process standard discovery and follow up communications regarding same (3.7); conference with K. Duff and J. Wine regarding claims process, standard discovery, joint submission and related issues (1.0); work on response to turnover motion and follow up regarding same with K. Duff and J. Wine (6751 Merrill and 7110 Cornell) (2.7).

Claims Administration & Objections

10/2/2020 JRW

6.70 Finalize joint statement regarding pending motions for filing and related exchange with counsel (.2); analyze new discovery requests proposed by claimants and update joint motion regarding same (1.8); review drafts and comment on response to motion and related conference with K. Duff (.4); work with M. Rachlis on joint report to Court regarding discovery and framework for same (1.0); work with M. Rachlis to revise standard discovery requests to investors (1.6); various emails and telephone conference with claimants' counsel regarding discovery requests, joint motion and exhibits (.4); conferences with A. Watychowicz regarding service issues and filings (.4); incorporate arguments from claimants into joint report and finalize same for filing (.9).

Claims Administration & Objections

AW

4.60 Attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2); work on revisions and finalization of objection to claimants' motion for turnover of proceeds and communications with K. Duff, M. Rachlis, and J. Wine regarding same (2.1); file and serve as per service list (.3); respond to claimant's email and voice message regarding discovery (.1); work with J. Wine on revisions and finalization of joint status on pending motions and discovery motion (1.6); file and serve as per service list (.3).

Claims Administration & Objections

MR

5.10 Further work and review of various joint status report, standard discovery and related issues including exchanges with J. Wine regarding these issues (3.9); work on response to turnover motion and several follow up conferences regarding same with J. Wine and K. Duff (7110 South Cornell and 6751 Merrill) (1.2).

Claims Administration & Objections

10/7/2020 KMP

0.60 Draft and revise notice letter to attorney regarding potential insurance claim at Receivership property (7114 S Cornell) and communicate with K. Duff and J. Wine regarding same (.5); attention to communications with insurer regarding potential claim (.1).

10/7/2020 JRW 0.40 Review and revise draft notice letter to law firm regarding claim (7114 S Cornell) and related correspondence with K. Pritchard and K. Duff.

Claims Administration & Objections

10/8/2020 JRW

0.90 Correspond with accountant regarding claimant inquiry (.1); confer with A. Watychowicz regarding claimant inquiries (.3), review of discovery responses and document images from claimant and draft proposed response to same (.5); attention to additional claimant inquiries.

Claims Administration & Objections

AW

1.00 Respond to claimant's email regarding discovery and update (.1); communicate with claimant regarding claims as listed on master claims spreadsheet (.1); attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2); communicate with J. Wine regarding claimant's premature submission, review and respond to claimant's email regarding discovery (.5); communicate with K. Duff and J. Wine regarding emails from claimants (.1).

Claims Administration & Objections

10/9/2020 JRW

2.20 Telephone conference with claimants' counsel regarding database vendor proposal (.1); review proposal filed by claimants and related email to K. Duff, M. Rachlis and A. Watychowicz (.4); telephone conference with collections counsel regarding settlement proposal (431 E 42nd Place) and related update to K. Duff and A. Porter (.6); confer with insurance agent regarding claim (7114 S Cornell) (.1) and related email to K. Duff regarding deductible (.1); prepare for and telephone conference with counsel regarding claim (7114 S Cornell) (.2) and send notice of receivership letter and cover email to same (.5); telephone conference with K. Duff and insurance agent regarding claim (7114 S Cornell) (.2).

Claims Administration & Objections

ΑW

0.20 Respond to claimant's email regarding discovery (.1); communicate with K. Duff and J. Wine regarding information received regarding Houston property and respond to same (.1).

Claims Administration & Objections

MR 0.20 Attention to proposal and issues regarding proposal for EB document library.

Claims Administration & Objections

10/12/2020 JRW

0.40 Review settlement offer from collections counsel regarding default judgments (431 E. 42nd Pl) and related communications with A. Porter and K. Duff (.2); correspondence to K. Duff and E. Duff regarding insurance deductible (4520 S Drexel) (.2).

Date Indiv H	ours Description
10/12/2020 AW	0.20 Attention to follow up email from claimant, communicate with K. Duff and J.
	Wine regarding same, and respond to email requesting tax update.
	Claims Administration & Objections
MR	0.50 Attention to claimants' reconsideration motion.
	Claims Administration & Objections
10/13/2020 JRW	0.90 Study claimants' motion to reconsider (.3); attention to claimant inquiry (.1); research regarding claimant inquiry and related correspondence to A. Watychowicz (.2); review case law regarding potential issue (.3).
	Claims Administration & Objections
AW	0.20 Attention to follow up email from claimant, communicate with K. Duff and J. Wine regarding same, and respond to email requesting several updates (.1); communicate with K. Duff regarding claim received and attention to cover letter (.1).
	Claims Administration & Objections
10/14/2020 JRW	0.20 Attention to inquiries from claimant.
	Claims Administration & Objections
AW	0.90 Attention to another follow up from claimant and communicate with K. Duff and J. Wine regarding same and detailed updates (.2); attention to claim received, review same, and prepare description for upload to database (.5); respond to emails from claimants regarding update request and discovery issues (.2).
	Claims Administration & Objections
MR	0.60 Work on draft communication on claims process discovery (.3); attention to reply brief on turnover issues and follow up regarding same (.3)
	Claims Administration & Objections
10/15/2020 JRW	0.80 Telephone conference with K. Duff regarding claims process and legal authority (.5); telephone conference with A. Watychowicz regarding communications to claimants regarding invalid email addresses (.3).
	Claims Administration & Objections
AW	5.40 Communicate with K. Duff and J. Wine regarding claims process emailing issues (.2); email claimants to request email address update and mail letter notices to claimants (1.7); communicate with claims vendor regarding

Date Indiv H	ours Description
	addition of new claim (.1); work on bounced emails project relating to claims process communications and call with J. Wine regarding same (3.4).
	Claims Administration & Objections
10/15/2020 MR	0.20 Further attention to discovery related issues.
	Claims Administration & Objections
10/16/2020 JRW	0.50 Work with A. Watychowicz on communications with claimants (.4); confer with A. Watychowicz regarding claim (.1).
	Claims Administration & Objections
10/19/2020 JRW	0.20 Review reply to motion to turnover proceeds from sales.
	Claims Administration & Objections
AW	0.80 Attention to emails from claimants who responded to email update request, update emailing list, and notify claims vendors regarding same (.7); respond to email from claimant regarding discovery issues (.1).
	Claims Administration & Objections
MR	2.00 Research and attention to response to reconsideration motion.
	Claims Administration & Objections
10/20/2020 MR	3.00 Further work on response on motion for reconsideration.
	Claims Administration & Objections
10/21/2020 MR	5.00 Further work to respond to motion for reconsideration and research various issues regarding same.
	Claims Administration & Objections
10/22/2020 JRW	0.20 Exchange correspondence with K. Duff regarding claims analysis.
	Claims Administration & Objections
MR	0.20 Further attention to motion for reconsideration.
	Claims Administration & Objections
10/23/2020 JRW	0.50 Study objections to tenth sales motion and related correspondence with K. Duff, M. Rachlis and A. Porter regarding properties covered by motion.
	Claims Administration & Objections

<u>Date Indiv H</u>	ours Description
10/23/2020 MR	1.70 Further work on response on motion for reconsideration (1.4); attention to turnover motion and upcoming issues for hearing on claims process (.3).
	Claims Administration & Objections
10/24/2020 MR	0.30 Follow up on issues on draft motion for reconsideration and follow up with K. Duff regarding same.
	Claims Administration & Objections
10/25/2020 MR	0.60 Attention to email on claims related issues (.2); further work on motion for reconsideration and follow up with K. Duff (.4).
	Claims Administration & Objections
10/26/2020 JRW	4.40 Review and work with M. Rachlis and K. Duff on revision and finalization of response to motion to reconsider (1.7); work with M. Rachlis on response to institutional lenders' proposal for EquityBuild documents (2.1); exchange correspondence with K. Duff regarding document vendor proposal and related review of same (.3); email exchange with M. Rachlis regarding upcoming hearing on issues relating to claims process (.2); review proposal for distribution of claims documentation from vendor and send analysis to M. Rachlis and K. Duff (.1).
	Claims Administration & Objections
AW	2.70 Attention to emails from claimants who responded to email update request (.1); follow up with J. Wine regarding response to proposal for EquityBuild documents (.1); study response to motion to reconsider and email counsel regarding revisions (1.1); further revisions to same (.7); work to finalize response, file with court, and serve as per service list (.7).
	Claims Administration & Objections
MR	4.50 Further work on motion for reconsideration issues (1.2); attention to issues regarding document proposal; attention to claims and work with J. Wine regarding same (2.0); further prepare for upcoming hearing on claims process (1.3).
	Claims Administration & Objections
10/27/2020 JRW	5.90 Review, revise and finalize response to proposal for EquityBuild documents (.3) and related exchange regarding service (.1); attention to responding to claimant inquiries (.2); study standard claims process discovery, joint submissions, motion and objections in preparation for hearing on claims process motion (1.6); telephone conference with claimant's counsel regarding discovery dispute (.1); conference call with M. Rachlis and K. Duff regarding court's orders and preparation for hearing (.9); related review of outline regarding claims planning (.2); exchange correspondence with potential vendor regarding status of project and pending motion (.1); attend telephonic hearing before Judge Lee regarding claims process (2.4).

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

10/27/2020 AW

2.10 Email response to claimant regarding access to telephone hearing (.1); follow up with K. Duff and J. Wine regarding requests for update and discovery issues from claimants (.2); proofread response to proposal for EquityBuild documents and email counsel regarding same (.4); further revisions to response and communicate with counsel regarding same (.4); include additional final revisions, finalize response, file with Court, and serve as per service list (.7); communicate with K. Duff and J. Wine regarding claimants' response to service of response to proposal for EquityBuild documents (.2); redact email regarding claimant request and forward same to K. Duff (.1).

Claims Administration & Objections

5.20 Further prepare for (2.0) and participate in hearing before Judge Lee regarding claims process (2.4); participate in meeting with K. Duff and J. Wine relating to same (.8).

Claims Administration & Objections

10/28/2020 JRW

MR

2.20 Study motion to stay, motion for certification of interlocutory appeal, and notice of appeal (1131-41 79th, 6250 Mozart) (.6); correspondence with claimant's counsel regarding proposed vendor (.1); telephone conference with M. Rachlis, A. Porter, and K. Duff regarding hearing on claims motion and related follow-up, claimant's notice of appeal and motions to stay and for certification of interlocutory appeal (1131-41 79th, 6250 Mozart) and status of property sales (1.5).

Claims Administration & Objections

AW 0.20 Revise proposed order granting remainder of second restoration motion and email counsel regarding same.

Claims Administration & Objections

MR 5.00 Review appellate materials to prepare for meeting (1.0); research regarding same (2.3); participate in meeting with J. Wine, K. Duff and A. Porter regarding motion to stay regarding pending appellate issues and property sales and stay issues (1.5); conference with A. Porter and K. Duff regarding properties (6250 Mozart) (.1) and (1131 E. 79th) (.1).

Claims Administration & Objections

AEP 1.40 Teleconference with K. Duff, M. Rachlis, and J. Wine regarding appeal from order granting ninth motion to confirm (1.2); teleconference with Messrs. Duff and Rachlis regarding receivership properties (1131 E 79th and 6250 S Mozart) (.2).

Claims Administration & Objections

10/29/2020 AEP

1.10 Teleconference with EquityBuild investor regarding procedural status of litigation, claims process, factual background of transactions in which funds were invested, and timeline to completion.

10/29/2020 JRW

1.90 Review information from proposed vendor for hosting EquityBuild documents and related emails with claimant's counsel (.2); attention to responding to claimant inquiries (.7); telephone conference with claimant's counsel regarding strategy for distribution of claims data (.4) and related communications with K. Duff and M. Rachlis (.2); review analysis of caselaw (.4).

Claims Administration & Objections

ΑW

0.70 Respond to claimants' inquiries about discovery (.2) and about confirming their claims (.1); remove claimant from mailing list per his request and respond to email (.1); work with K. Duff and J. Wine on updated responses to claimants inquiring about status report (.3).

Claims Administration & Objections

MR 0.20 Attention to issues on distribution of claims data.

Claims Administration & Objections

10/30/2020 KMP

0.40 Review receivership notices (638 N Avers) and communication with K. Duff regarding same (.2); communicate with K. Duff and J. Wine regarding notice issues in connection with collection notice (4611 S Drexel) (.2).

Claims Administration & Objections

**JRW** 

0.90 Exchange correspondence regarding proposed vendor (.1); exchange correspondence with K. Duff and A. Watychowicz regarding service of represented claimants (.3); study memorandum in support of motion to stay, legal authority cited therein, and related analysis from K. Duff (1131-41 79th, 6250 Mozart) (.5).

Claims Administration & Objections

AW

0.40 Respond to claimants' inquiries about confirming their claims (.1); attention to emails from claimants in response to served status report, review claims, and communicate with K. Duff and J. Wine regarding proposed revisions to master claims list (.3).

Claims Administration & Objections

SUBTOTAL: 1[02.60 29890.00]

Date Indiv Hours Description			
Status Reports		-	
10/1/2020	KMP	4.60	Continue preparation of financial exhibits for 3Q2020 status report.
			Status Reports
	MR	0.80	Work and review and comment on status reports and communications regarding same.
			Status Reports
10/2/2020	KMP	3.60	Continue preparation of financial exhibits for 3Q2020 status report.
			Status Reports
10/5/2020	JRW	0.30	Begin drafting 3rd Quarter status report and related emails to team regarding items needed.
			Status Reports
10/6/2020	KMP	4.10	Continue working on financial exhibits for 3Q2020 status report, and communicate with EB team regarding same.
			Status Reports
	JRW	2.00	Drafting of status report for third quarter 2020 (1.8); related emails from K. Pritchard regarding exhibits to same (.1); emails to professionals regarding work performed during third quarter (.1).
			Status Reports
	JR	1.10	Review email from property management regarding tax payments in 3rd quarter of 2020 and draft report related to 3rd quarter status report (.9); exchange correspondence with property management requesting a comprehensive list of all property tax payments for 2020 (.2).
			Status Reports
10/7/2020	KMP	2.40	Continue work on financial exhibits for 3Q2020 status report, and communicate with J. Wiine and J. Rak regarding same.
			Status Reports
	JRW	0.70	Exchange correspondence with K. Duff regarding inclusion of attorneys' lien issue (7114 S Cornell) in third quarter status report (.1); drafting of 3rd quarter status report (.6).
			Status Reports
	JR	1.50	Draft requested information required for 2020 3rd quarter status report.
			Status Reports

Date	Indiv	<u>Hours</u>	Description
10/8/2020	KMP	1.30	Continue work on exhibits for 3Q2020 status report.
			Status Reports
10/9/2020	JRW	1.50	Continued attention to preparation of third quarter 2020 status report.
			Status Reports
10/12/2020	) KMP	0.50	Confer with J. Wine regarding various aspects of status report and revise certain financial exhibits in connection with same.
			Status Reports
	JRW	4.20	Attention to preparing third quarter 2020 status report and related communications with K. Pritchard regarding exhibits to same.
			Status Reports
	AW	0.30	Research email traffic for third quarter of 2020 and report to J. Wine regarding same.
			Status Reports
	JR	2.70	Review and update outstanding property taxes that remain in the EquityBuild portfolio (1.4); prepare and produce requested information to J. Wine regarding 3rd quarter status report (1.3).
			Status Reports
10/13/2020	) KMP	0.50	Additional revisions to financial exhibits in connection with third quarter status report.
			Status Reports
	JRW	1.20	Continue preparing status report for third quarter 2020 and related exchange with J. Rak regarding sold properties.
			Status Reports
10/14/2020	KMP	0.30	Confer with J. Wine and E. Duff regarding third quarter status report.
			Status Reports
	ED	0.30	Review and edit description of reimbursable amounts for third quarter status report (.2), and email correspondence with J. Wine and K. Pritchard regarding same (.1).
			Status Reports
	JRW	4.60	Attention to preparing third quarter 2020 status report (4.3); related communications with E. Duff regarding restoration status and reporting (.3).
			Status Reports

<u>Date Indiv H</u>	ours Description
10/14/2020 JR	0.20 Exchange correspondence with J. Wine regarding requested property tax information for 2020 3rd quarter status report.
	Status Reports
10/15/2020 JRW	4.60 Attention to drafting status report (4.4); related exchange of correspondence with counsel regarding status of insurance matters (.2).
	Status Reports
10/16/2020 JRW	0.70 Review revisions to third quarter 2020 status report and related communications with counsel regarding status of matters.
	Status Reports
MR	1.20 Work on status report.
	Status Reports
10/18/2020 MR	1.00 Further attention to status report.
	Status Reports
10/19/2020 JRW	3.80 Edit draft third quarter status report to incorporate comments from K. Duff and M. Rachlis (3.0); confer with J. Rak regarding tax balances and closed property sales exhibit (.3); assemble exhibits to status report (.5).
	Status Reports
AW	0.70 Communicate with J. Wine regarding preparation of exhibits and prepare final version of master claims list (.4); attention to email from J. Wine regarding discovery issues, review issued discovery and report regarding same (.3).
	Status Reports
MR	0.50 Attention to various issues on status report.
	Status Reports
JR	1.50 Review email from J. Wine and provide requested unsold property information related to 3rd quarter status report (1.2); phone conversation with J. Wine regarding same (.3).
	Status Reports
10/20/2020 JRW	2.30 Continued drafting and revising third quarter 2020 status report and related communications with M. Rachlis, K. Duff, J. Rak, A. Watychowicz, additional counsel and accountant (1.3); work with A. Watychowicz to assemble exhibits to status report (1.0).
	Status Reports
AW	0.80 Review draft exhibits, work on finalization of selected exhibits, and communicate with J. Wine regarding possible revisions (.4); communicate with J. Wine regarding master claims list and agreed on format (.1); finalize

<u>Date</u> <u>Indiv</u>	Hours Description
	exhibits 1-8 and email J. Wine regarding same (.3).
	Status Reports
10/20/2020 MR	1.10 Further review and comment on status report and follow up with J. Wine and K. Duff.
	Status Reports
JR	0.30 Exchange correspondence with J. Wine relating to 3rd quarter 2020 status report and requested information regarding sold taxes for property (431 E 42nd).
	Status Reports
10/28/2020 JRW	<ul><li>0.30 Confer with A. Watychowicz regarding finalization and filing of status report (.1) and revise same (.2).</li></ul>
	Status Reports
10/29/2020 JRW	0.50 Revise exhibit to third quarter status report (.2); work with A. Watychowicz and K. Duff on cover email to claimants (.3).
	Status Reports
AW	1.40 Proofread status report and communicate with counsel regarding revisions (.7); email exchange regarding transmittal message to claimants (.1); finalize quarterly status report, file with court, and serve as per service list(.6).
	Status Reports
SUBTOTAL:	<u> </u>
Tax Issues	
10/12/2020 KMP	O.30 Review account ledgers and communicate with tax administrator regarding certain transactions from Receiver's account in connection with preparation of tax returns.
	Tax Issues
10/14/2020 KMP	0.40 Attention to receipt of electronic copy of Receivership 2019 tax returns from tax administrator and communications regarding same (.2); communications with tax administrator and accountant transmitting form 1099-S from recent sale of property (6437 S Kenwood) (.2).
	Tax Issues
10/21/2020 KMP	0.20 Forward form 1099-S relating to sale of property (7110 S Cornell) to tax administrator and accountant.
	Tax Issues

Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 89 of 182 PageID #:20358 Kevin B. Duff, Receiver Page 40

<u>Date</u>	Indiv Hours Description		
SUBTOTAL:		[ 0.90	126.00]
		399.60	\$97.469.00

Other Charges			
	Description		
Business Operations			
	Photocopies for October 2020		25.00
	Online research for October 2020		405.53
	Software licenses (Google - \$96.00; InSynq - \$266.50)		362.50
SUBTOTAL:		[	793.03]
Total Other Charges			\$793.03

Summary of Activity

=	,,		
	Hours	Rate	
Jodi Wine	90.00	260.00	\$23,400.00
Ania Watychowicz	32.20	140.00	\$4,508.00
Justyna Řak	121.40	140.00	\$16,996.00
Kathleen M. Pritchard	33.10	140.00	\$4,634.00
Andrew E. Porter	57.70	390.00	\$22,503.00
Ellen Duff	15.90	390.00	\$6,201.00
Michael Rachlis	49.30	390.00	\$19,227.00

# **SUMMARY**

Legal Services	\$97,469.00
Other Charges	\$793.03
TOTAL DUE	\$98,262.03

# Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 92 of 182 PageID #:20361 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 12, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622128

Legal Fees for the period November 2020

\$111,345.00

**Expenses Disbursed** 

\$2,763.36

Due this Invoice \$114,108.36

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description	
Accounting/Auditing				
11/2/2020	KMP	0.80	Review numerous bank statements for Receivership accounts (.6); communicate with E. Duff to forward September financial schedules for Receiver's accounts (.2).	
			Accounting/Auditing	
11/11/202	0 KMP	0.40	Confer with K. Duff and J. Rak regarding deposit of check to property account (7201 Dorchester).	from title company
			Accounting/Auditing	
11/12/202	0 KMP	1.60	Record transactions, review account statements, and reco accounts.	ncile Receiver's
			Accounting/Auditing	
SUBTOTAL:			[ 2	2.80 392.00]
Asset Analysis & Recovery				
11/2/2020	AW	0.40	Research regarding settlement statement (6217 S Dorchester) and communicate with J. Wine and K. Duff regarding same.	
			Asset Analysis & Recovery	
11/8/2020	JR	3.20	Compare and complete analysis of June property reports.	
			Asset Analysis & Recovery	
11/9/2020	JR	1.30	Review property reports and complete analysis with accountant reports (1.1); exchange correspondence with E. Duff regarding same and indicate discrepancy regarding property report (7749 Yates) (.2).	
			Asset Analysis & Recovery	
11/12/202	0 JR	2.50	Review email from E. Duff and respond accordingly regarding review of June reports (.1); study property reports for June (2.1); exchange correspondence with E. Duff providing details and comments related to review and discrepancies found on reports (.3).	
			Asset Analysis & Recovery	
11/13/202	0 JR	0.60	Review email from accountant regarding discrepancies found in reports, review additional reports and respond accordingly requesting updated reports.	
			Asset Analysis & Recovery	

Indiv Hours Description Date 11/19/2020 JR 0.20 Review email from E. Duff regarding status of closed properties and July reporting and respond reading same. Asset Analysis & Recovery 11/24/2020 JR 2.70 Review property reports for July, compare and analyze for discrepancies with accounting firm July reports. Asset Analysis & Recovery SUBTOTAL: [10.90 1526.00] Asset Disposition 11/1/2020 JR 1.60 Draft and update closing documents (7656-58 S. Kingston). Asset Disposition 11/2/2020 JRW 0.50 Review objections to tenth sales motion and SEC reply to same. Asset Disposition JR 6.40 Review and update closing documents for property in preparation for A. Porter review and execution by K. Duff (431 E. 42nd, 816 E. Marquette, 7600 S. Kingston and 7656 S. Kingston) (3.9); exchange correspondence with A. Porter requesting review of same (431 E. 42nd, 816 E. Marquette, 7600 S. Kingston and 7656 S. Kingston) (.1); review leases and update certified rent roll for property (816 E. Marquette) (1.2); prepare notice to tenants regarding same (816 S. Marquette) (.4); exchange correspondence with buyer's counsel regarding requested information for tenants and produce notices to tenants for review and approval (816 E. Marquette) (.2); draft transfer tax declaration form for property (6949 S. Merrill) (.3); prepare transfer tax declaration form in anticipation for closing (431 E. 42nd) (.3). Asset Disposition 2.30 Review and analyze all title documents associated with receivership property **AEP** (6217 S Dorchester) and prepare e-mail to J. Wine and K. Duff (.4); review and revise all closing documents associated with prospective sale of receivership property (431 E 42nd) (.7); review and revise all closing documents associated with prospective sale of receivership property (816 E Marquette) (1.2).

Asset Disposition

MR 0.30 Attention to intervenor's notice of appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1) attention to SEC submission on tenth sales motion (.2).

11/3/2020 AW

0.50 Finalize Receiver's notice of property sales, file with the court, and serve as per service list.

**Asset Disposition** 

JR 6.20 Review email from A. Porter and produce closing documents for execution to K. Duff (431 E. 42nd and 816 E. Marquette) (1.3); complete execution with K. Duff and A. Watychowicz regarding same (431 E. 42nd and 816 E. Marquette) (.9); exchange correspondence with buyer's counsel providing title company closer contact information related to closing (431 E. 42nd) (.1); exchange correspondence with K. Pritchard related to payment for property related to fire (638 N. Avers) (.2); final review of lien waivers for properties (431 E. 42nd and 816 E. Marquette) and request execution from broker (.1); review notice to tenants for property (816 E. Marquette), exchange correspondence with A. Porter regarding same and forward to property management for execution (816 E. Marquette) (.3); review email from property management and provide requested information regarding post-sale rents for property (7508 S.Essex) (.1); request executions of documents from A. Porter for closing disclosure statements for properties (431 E. 42nd and 816 E. Marquette) (.1); review email from buyer's counsel, provide requested documents and request buyer information for property (7255 S. Euclid) (.2); review leases and security deposits, update certified rent roll in anticipation of closing (7442 S. Calumet) (.9); prepare notices to tenants regarding same (7442 S. Calumet) (.7); exchange correspondence with property management requesting property and tenant information for anticipated closing (7442 S. Calumet) (.2); review leases and security deposits and update certified rent roll in preparation for closing (7701 S. Essex) (.9); update notices to tenants regarding same (7701 S. Essex) (.2).

Asset Disposition

AEP 1.90 Analyze public records pertaining to chain of title associated with receivership property (5437 S Laflin) and create outline of issues for analysis by potential substitute title insurer (1.5); read through latest administrative orders forwarded by J. Wine and update closing checklists (.2); read e-mails sent by K. Duff and M. Rachlis regarding relative merits of conveying receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) prior to entry of order staying sales pending appeal and respond thereto (.2).

**Asset Disposition** 

11/4/2020 JRW 1.10 Review and revise response to institutional lender's motion to stay.

**Asset Disposition** 

AW 2.10 Work with K. Duff, J. Wine, and M. Rachlis on response to motion to stay sales including but not limited to revisions to response, issue of service, finalization, filing, and service.

11/4/2020 JR

6.00 Review emails from property management and update electronic files relating to closing (7442 S. Calumet) (.2); follow up correspondence with broker requesting lien waivers for closings (816 E. Marquette and 431 E. 42nd) (.1); update certified rent roll related to missing leases and subsidy agreements for property (7701 S. Essex) (.6); exchange correspondence with property management requesting same (7701 S. Essex) (.2); update notices to tenants for property (7701 S. Essex) (.5); exchange correspondence with buyer's counsel requesting approval of same (7701 S. Essex) (.1); review closing confirmations for properties (7600 and 6756 S. Kingston) and update electronic files (.2); exchange correspondence with all parties notifying of same (.1); review closing confirmations for properties (7442 S. Calumet and 7701 S. Essex) and update electronic files (.2); exchange correspondence with all parties regarding same (7442 S. Calumet and 7701 S. Essex) (.1); review leases, security deposits for property in preparation for closing (7600 S. Kingston) (1.3); update draft certified rent roll regarding same (7600 S. Kingston) (1.4);exchange correspondence with property management requesting missing leases and subsidy agreements in anticipation for closing (7600 S. Kingston) (.1); review leases and security deposits for property in anticipation for closing (7656 S. Kingston) (.6); update draft certified rent roll relating to same (7656 S. Kingston) (.3).

**Asset Disposition** 

AEP 2.90 Review, analyze, and prepare additional modifications to draft purchase and sale contract associated with receivership property (.4); teleconference with counsel for prospective purchaser of receivership properties (7600 S Kingston, 7656 S Kingston) regarding potential closing date (.2); teleconference with counsel for prospective purchaser of receivership property (6949 S Merrill) regarding closing date (.1);summarize revisions needed to title commitments on receivership properties (7600 S Kingston, 7656 S Kingston) and convey same to title insurer (.2); teleconference with new title insurer regarding conditions under which said insurer will agree to issue title commitment on receivership property (7237 SBennett), prepare title order, and communicate status of transaction to purchaser's counsel (.5); prepare first draft of eleventh motion to confirm sales (7237 S Bennett) (1.5).

**Asset Disposition** 

11/5/2020 KMP

0.30 Confer with A. Watychowicz regarding procedural issues for lenders' and intervenor's appeals (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

JRW 1.00 Prepare for and participate in hearing on institutional lenders' motion to stay execution of order granting ninth sales motion (.4); work with A. Watychowicz on docketing of appellate deadlines, related review of orders and rules, and correspondence with M. Rachlis regarding docketing statement (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.6).

11/5/2020 JR

5.80 Attend closing of vacant lot (431 E. 42nd) (3.4); exchange correspondence with all parties confirming the closing of vacant lot (431 E. 42nd) (.1); update closing documents related to property (7442 S. Calumet) (.9); follow up correspondence with broker requesting broker lien waiver for closing (431 E. 42nd) (.1); review email from buyer's counsel regarding scheduling of closing (4533 S. Calumet) and respond accordingly (.2); review closing statement from sale of properties regarding tax payments (1.1).

**Asset Disposition** 

4.20 Prepare e-mail to prospective new title insurer regarding factual background of litigation and legal effect of lis pendens filed in connection with same (.2); complete title application work for receivership property (4317 S Michigan) (.4); e-mail communications with counsel for prospective purchaser of receivership property (4533 S Calumet) regarding scheduling of closing (.1); continue analyzing public records and preparing memorandum to prospective new title insurer requesting consideration of waiver of title exceptions appearing on current version of title commitment for single-family homes (3.5).

**Asset Disposition** 

AW 0.60 Attention to filings in appellate court and update appeal docket (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); research and communicate with K. Duff regarding lack of presentment date for motion to stay sales, docket deadlines related to same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); attention to newly filed motion to intervene and communicate with counsel regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).

**Asset Disposition** 

AW 0.60 Compile all appellate pleadings, research appellate rules, and communicate with M. Rachlis regarding deadlines scheduled by appellate court and rules (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

11/6/2020 JRW

2.30 Review and revise multiple drafts of response to lenders' objections to 10th sales motion (1.8); review and revise declaration (.2); work with K.Pritchard to finalize and file response brief (.3).

**Asset Disposition** 

AW 1.30 Study reply in support of tenth sales motion and declaration and email counsel regarding revisions (.9); compile exhibits to same and prepare transmittal email to claimants (.4).

Asset Disposition

JR 5.10 Exchange correspondence with property management requesting additional tax payment information related to EquityBuild estate (.1); review closing statements from closed properties and determine overall total tax payment

for each property, update report (3.8); review outstanding tax balances and update report for unsold properties (.7); review tax payments completed by property management and update report (.2); exchange correspondence with K. Duff and K. Pritchard regarding same (.3).

Asset Disposition

11/6/2020 AEP

4.20 Finalize review and analysis of remaining properties associated with title exceptions in single-family home portfolio and preparation of memorandum to prospective new title insurer regarding potential waiver of exceptions (2.3); continue revising draft eleventh motion to confirm sales and prepare e-mail to title insurer requesting revisions to title commitment consistent with prospective language of confirmation order (.7); teleconference with K. Duff and J. Wine regarding receivership property (6217 S Dorchester) and prepare brief series of paragraphs with exhibits explaining chain of title (1.2).

**Asset Disposition** 

KMP 0.50 Prepare exhibits for reply in support of tenth motion to approve property sales, finalize motion, and file electronically.

Asset Disposition

11/8/2020 JR 0.80 Update closing documents for upcoming closing (7701 S. Essex).

**Asset Disposition** 

11/9/2020 JRW

2.50 Review court's order regarding motions to stay and related correspondence with team (1.2); review draft motion (.1); exchange correspondence with A. Porter regarding administrative orders at closing (431 E 42nd Place) (.1); conference call with A. Porter, K. Duff and M. Rachlis regarding closings of properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill) and motion to set aside default judgment (4611 S Drexel) (.9);review intervenor's motion for return of earnest money (7600 S Kingston, 7656 S Kingston, 6949 S Merrill) (.2).

**Asset Disposition** 

JR 3.70 Review email correspondence from buyer's counsel requesting updated rent rolls for closings (7600 and 7656 S. Kingston) (.1); update certified rent roll regarding same with unit information (7600 and 7656 S. Kingston) (.6); review subsidy contract for property and request same from property management (7656 S. Kingston) (.3); exchange correspondence with A. Porter requesting final approval of closing documents for upcoming closings (7656 S. Kingston, 7600 S. Kingston, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); review subsidy contracts forproperty (7600 S. Kingston) (.3); exchange further correspondence with property management requesting same (7600 S. Kingston) (.1); exchange correspondence with buyer's counsel providing requested subsidy contracts for properties (7600 and 7656 S. Kingston) (.1); update closing documents for property (6949 S. Merrill) (.9); update notices to tenants and request approval from purchaser relating to properties (7600 and 7656 S. Kingston) (.5); review emails and exchange

correspondence with A. Porter relating to possible delay of closings (7600 S. Kingston, 7656 S. Kingston and 6949 S. Merrill) (.2); follow up with the title company water department on water applications previously submitted for processing (816 E. Marquette, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) (.2); exchange correspondence with property management providing latest closing confirmations for various properties (816 E. Marquette, 7442 S. Calumet, 7701 S. Essex, 4533 S. Calumet) (.2).

Asset Disposition

11/9/2020 AEP

4.10 Teleconference with prospective purchaser of receivership property (6949 S Merrill) regarding potential advancement of closing date and appeal filed by intervenor (.3); communications with former EquityBuild title insurer regarding obstacles associated with request for hold harmless indemnity (.2); teleconference with K. Duff, M. Rachlis, and J. Wine regarding closing sales of receivership properties and resolution of issues associated with vacated default judgments entered against receivership property (431 E 42nd Street) (.9); review, revise, and inventory all closing documents associated with prospective sale of receivership property (7442 S Calumet) (.9); communications with counsel for prospective purchaser of receivership property (4533 S Calumet) regarding scheduling of closing (.2); teleconference with J. Rak regarding preparation for, and status of, next six scheduled closings (.2); review, revise, and inventory closing documents relating to prospective conveyance of receivership property (7701 S Essex) (.8); teleconference with counsel for prospective purchasers of receivership properties subject to motion to stay (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) regarding possibility of rescheduling closings (.6).

**Asset Disposition** 

MR

3.70 Conferences regarding closings and issues on stays and appeal with A. Porter, K. Duff and J. Wine (7600 Kingston, 7656 Kingston and 6949 Merrill) (.8); attention to issues regarding intervenor's motion on escrow and issues regarding responses to stay (7600 Kingston, 7656 Kingston and 6949 Merrill) (2.9).

**Asset Disposition** 

11/10/2020 JRW

3.80 Review and revise draft opposition to intervenor's motion to stay (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.8); legal research regarding authority cited in motion to stay argument (2.0).

**Asset Disposition** 

ΑW

2.80 Work on finalization of closing documents for seven properties (4315 S Michigan, 4533 S Calumet, 6459 S Merrill, 7442 S Calumet, 7600 S Kingston, 7656 S Kingston, 7701 S Essex) (1.6); proofread opposition to third party motion to stay and email M. Rachlis regarding revisions (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.1); communicate with K. Duff regarding docketing statement (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).

11/10/2020 JR

7.30 Review email from the title company requesting water meter pictures for processing of water applications (816 S. Marquette and 4533 S. Calumet) (.1): exchange correspondence with property management regarding same (816 S. Marquette and 4533 S. Calumet) (.1); exchange correspondence with broker requesting execution of lien waivers for closings (7600 S. Kingston and 7656 S. Kingston) (.1); exchange correspondence with A. Porter regarding upcoming closings and rescheduling of same (7600 Kingston and 6949 Merrill) (.2); callwith A. Porter and J. Porter regarding upcoming closings and attending closings (1.0); update closing documents related to properties (7600 Kingston, 7656 Kingston, 6949 S. Merrill, 4533 Calumet, 4317 Michigan) (2.9); exchange correspondence with A. Watychowicz relating to assisting in execution of closing documents (7600 Kingston, 7656 Kingston, 6949 S. Merrill, 4533 Calumet, 4317 Michigan) (.3); exchange correspondence with A. Porter regarding same (.1); review email from buyer's counsel regarding rent payment post-closing (6558 S. Vernon) (.1); request information from property management regarding same (6558 S. Vernon) (.1); exchange correspondence with property management requesting rent roll and property information in preparation for closing (6949 S. Merrill) (.1); review rent roll, leases and security deposits for property (6949 S. Merrill) (1.7); request additional tenant leases, subsidy agreements and security deposit information for same (6949 S. Merrill) from property manager (.3); review email from buyer's counsel requesting property information (4533 S. Calumet) (.1); request same from property manager and provide to buyer's counsel (4533 S. Calumet (.1).

#### **Asset Disposition**

**AEP** 7.00 Review and revise all documents of conveyance in connection with anticipated closing of receivership property (7600 S Kingston) (1.1); review and revise closing documents associated with prospective conveyance of receivership property (6949 S Merrill) (1.0); teleconference with J. Rak regarding all outstanding closing-related issues associated with receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7442 S Calumet, 7701 S Essex) and preparation therefor (.7); prepare all notarization-required closing documents for next batch of sales of receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7442 S Calumet, 7701 S Essex) (2.5); review and revise remaining closing documents associated with prospective sale of receivership property (4533 S Calumet) (.8): review and revise remaining closing documents relating to prospective sale of receivership property (4515 S Michigan) (.7); review revised surveys and approve same for receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7742 S Calumet, and 7701 S Essex) (.2).

**Asset Disposition** 

MR

3.10 Attention to various appellate filings (.3); further attention to issues in regards to response on intervenor's motion to stay and review and revise same (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8).

11/11/2020 JRW

1.40 Review and revise multiple revisions of opposition to intervenor motion to stay (1.0); related conference with A. Porter and K. Duff (.4).

**Asset Disposition** 

ΑW

1.90 Work with K. Duff, M. Rachlis, and J. Wine on finalization of opposition to third party motion to stay, finalize opposition, and serve on defendant (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

JR 3.80 Prepare closing documents for execution for various properties (4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Juneway, 7656 S. Kingston) (1.3); meeting with K. Duff regarding execution of closing documents for same (4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Juneway, 7656 S. Kingston) (1.2); review email from property management related to previous request for property reports in preparation for closing (6949 S. Merrill) and update electronic files (.2); review email from property management regarding postponement of closing (6949 S. Merrill) (.1); notify all parties of cancellation of closings (6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) (.2); review requested water meter picture for property (4533 S. Calumet), update electronic files and forward to the title company for processing (.2); exchange correspondence with property management (PSR) requesting property information, rent roll and subsidy information in preparation for closing (4317 S. Michigan) (.1); exchange correspondence with K. Pritchardregarding deposit of check for property (7201 S. Dorchester) (.3); review email from property management regarding tax paymentsto date by property management and update electronic files (.2).

Asset Disposition

MR 2.60 Further work on response to intervenor's motion to stay and followup regarding same with K. Duff, J. Wine and A. Watychowicz.

**Asset Disposition** 

AEP 2.40 Teleconference with prospective purchaser of receivership property (6949 S Merrill) regarding need to postpone closing in view of judicial order indicating that motion to stay would be taken under advisement (.4); review closing statement from sale of receivership property (7201 S Dorchester) and respond to K. Duff regarding basis for escrow refund check (.1); communications with title underwriter regarding status of litigation involving claimant who recorded lis pendens against receivership property (4315 S Michigan) (.2); edit and revise draft memorandum in opposition to motion to stay sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (1.2); teleconference with K. Duff, M. Rachlis, and J. Wine regarding issues associated with motion to stay sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) and logistical effects thereof (.3); read latest administrative orders entered in

cases pending against former receivership properties (5618 S King, 6356 S California, 5001 S Drexel) and forward same to counsel for purchasers (.2).

**Asset Disposition** 

11/12/2020 KMP

JR

0.40 Review documentation regarding property purchase (8236 Ellis) to verify sale price in response to institutional lender's inquiry relating to same, and communicate with K. Duff and J. Wine regarding same.

Asset Disposition

3.00 Review email from property management regarding requested leases for property in preparation for closing (6949 S. Merrill), review leases, update electronic files and request further clarification on lease discrepancies (.7); review email from property management regarding requested water meter information for property (4533 S. Calumet) and request clarification for same (.1); review email from property management regarding requested property information in preparation for closing and update electronic files (4317 S. Michigan) (.1); review email from property management related to payment of property taxesfor all properties in estate from onset of receivership and save in electronic files (.1); review email from the title company water department regarding completed water application and update electronic files (7656 S. Kingston) (.1); review email from the title company water department regarding completed water application and update electronic files (7600 S. Kingston) (.1); review email from property management regarding requested water meter pictures for properties (4317 S. Michigan and 816 S. Marguette) and provide to the title company for processing (.2); update notice letters to tenants of property (7656 S. Kingston and 7600 Kingston) (.6); exchange correspondence with property management requesting execution of same as well as lien waivers for properties (7656 S. Kingston and 7600 Kingston) (.1); exchange correspondence with property management and the title company who is requesting additional pictures of water meters for properties (4317 S. Michigan and 816 S. Marguette) (.2); exchange correspondence with property management requesting property financial reporting in anticipation of closing (7656 S. Kingston and 7600 Kingston) (.1); update notices to tenants for property (6949 S. Merrill) (.6) (cont'd in next

Asset Disposition

entry).

2.80 (Cont'd from previous entry) Exchange correspondence with buyer's counsel regarding upcoming closings (7442 S. Calumet, 7701 S. Essex), requesting updated surveys (.1); request same from surveying company (7442 S. Calumet, 7701 S. Essex) (.1); review email from buyer's counsel requesting updated surveys related to upcoming closings and provide same (7600 Kingston, 7656 S. Kingston) (.2); final review of lien waivers and provide property management with lien waivers and notices to tenants for execution in preparation for closing (816 E. Marquette, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.4); request property income information for anticipation closings from property management (7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); exchange correspondence with A. Porter regarding signing of document in preparation for closing (4317 S. Michigan)

(.1); further correspondence with property management regarding tenant residing at property (6949 S. Merrill) related to anticipated closing (.3); update notice letter to tenants of property (4318 S. Michigan) and request approval from buyer (.3); review broker lien waivers for various properties (816 E. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex) and request execution of same from broker (.3); review requested surveys, update electronic files and provide to buyer's counsel regarding properties (7600 Kingston, 7656 S. Kingston) (.2); update notices to tenants and request approval from buyer's counsel related to property (4533 S. Calumet) (.4); review email from the title company regarding request of water meter pictures for property, update electronic filesand request same from property management (6949 S. Merrill) (.2).

Asset Disposition

11/13/2020 AW

1.20 Work with K. Duff, M. Rachlis, and J. Wine on surreply to motion to stay.

**Asset Disposition** 

JR

5.90 Review email from eviction counsel regarding tenants in eviction status and provide new buyer information for property (1700 Juneway) (.1); review email from the title company water department regarding status of water application (7442 S. Calumet) (.1); review requested property financial reports in preparation for closing (7442. S. Merrill, 6949 S. Calumet and 7701 S. Essex) and update electronic files (.3); review requested property financial reports in preparation for closing (7600 S. Kingston and 7656 S. Kingston) and update electronic files (.3); review requested and executed broker lien waivers and update electronic files (816 E. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex) (.3); review email from the title company regarding earnest money for properties (7600 Kingston, 7656 S. Kingston and 6949 S. Merrill), respond accordingly and further exchange correspondence with A. Porter regarding same (.1); review delinquency and ledger pertaining to proration of rents for property (7701 S. Essex), update certified rent roll and closing figures in preparation for closing (7701 S. Essex) (.7); review delinquency report, ledger and update certified rent roll and rent prorations for property in anticipation for upcoming closing (7442 S. Calumet) (.8); follow up correspondence with property management regarding documents needed for closing (7442 S. Calumet and 7701 S. Essex) (.1); draft tax declaration in preparation for closing (7701 S. Essex) (.2); finalize remainder of closing documents in preparation for closing and upload to electronic files (7701 S. Essex) (.9); finalize remainder of closing documents in preparation for closing and uploadto electronic files (7442 S. Calumet) (.9); review delinquency report, ledger and update certified rent roll in preparation for closing (6949 S. Merrill) (1.1).

11/14/2020 MR

3.00 Further review and revise draft motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

11/15/2020 JRW

0.90 Review latest revisions and further revise motion to dismiss appeal (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

MR 1.50 Review draft motion to dismiss appeal and work on docketing statement and follow up regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

AEP

0.60 Read and respond to e-mail inquiry from prospective purchaser of receivership property (4611 S Drexel) regarding procedural status of motion to confirm and potential timeline for closing (.2); review settlement statements for closings for receivership properties (7701 S Essex and 7442 S Calumet) to confirm accuracy (.2); teleconference with J. Rak regarding final preparation for closings of receivership properties (7701 S Essex and 7442 S Calumet) (.1); prepare e-mail to counsel for purchasers of receivership properties subject to motion to stay (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) regarding status of ruling by court and potential for further delays (.1).

Asset Disposition

11/16/2020 JRW

1.80 Research regarding appellate rules and related communications with EquityBuild team and telephone conference with clerk of appellate court (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

ΑW

4.10 Work on motion to dismiss appeal and docketing statement (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.3); communicate with K. Pritchard regarding revisions to motion, table of authorities, disclosure with exhibit, and docketing statement and work to finalize documents for filing (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.8).

**Asset Disposition** 

JR

6.60 Attend closing (7701 S. Essex) (2.4); attend closing (7442 S. Calumet) (2.8); exchange correspondence with buyer providing all leases and subsidy agreements related to properties (7701 S. Essex and 7442 S. Calumet) (.2); provide closing details to all parties related to closings (7701 S. Essex and 7442 S. Calumet) (.1); exchange correspondence with property management notifying of canceled closing (6949 S. Merrill) (.2); exchange correspondence with property management notifying of canceled closings (7600 S. Kingston and 7656 S. Kingston) (.2); exchange correspondence with brokers notifying of closing cancellations and provide closing statement from closings (7442 S. Calumet and 7701 S. Essex) (.2); review documents,

organize and upload to electronic files (7701 S. Essex) (.4); exchange correspondence with the title company regarding missing closing documents related to closing (7701 S. Essex and 7442 S. Calumet) (.1).

Asset Disposition

11/16/2020 AEP

1.70 Teleconference with K. Duff and M. Rachlis regarding potential closing of sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) pending judicial consideration of motion to stay (.4); assist with closing of receivership property, including prorations and final review of settlement statement (7701 S Essex) (.5); assist with closing of receivership property, including prorations and final review of settlement statement (7442 S Calumet) (.3); read e-mail inquiry from M. Rachlis regarding ownership structures of corporate entities, review operating agreements in files, and prepare response thereto (.3); communications with counsel for purchasers of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) regarding intention to close (.2).

**Asset Disposition** 

11/17/2020 KMP

0.20 Review bank records to confirm receipt of proceeds from sales of properties (7701 S Essex, 7442 S Calumet) and communicate with J. Rak regarding same.

Asset Disposition

JR

4.70 Review emails, produce, organize and upload electronic files related to closing documents for rescheduled closings (7600 S. Kingston, 7656 S. Kingston and 6949 S. Merrill) (2.3); review email from the title company water department regarding a completed water application for property and update electronic files (6949 S. Merrill) (.2); review email from title company regarding closing documents from closing and update electronic files (7701 S. Essex and 7442 S. Calumet) (.1); exchange correspondence with A. Porter and the title company regarding water application for property in preparation for closing (4317 S. Michigan) (.3); exchange correspondence with property management requesting updated reports for property in anticipation of closing (816 E. Marquette) (.2); review and update certified rent roll for closing (816 E. Marquette) (.7); update preliminary closing statement and exchange correspondence with closer at the title company providing executed closing documents for closing (816 E. Marquette) (.6); review email from eviction attorney and provide requested information for buyer on previously sold property (7201 S. Constance) (.1); review email from K. Duff related to request to review purchase and sale agreement and provide a compare analysis of same (1102 Bingham) (.2).

**Asset Disposition** 

MR

0.50 Attention to issues on intervenor's motion to dismiss and attention to various appellate filings and upcoming issues (7600 Kingston, 7656 Kingston, 6949 Merrill).

11/17/2020 AEP

1.60 Teleconference with receivership broker regarding cancellation of closings of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) in wake of judicial order and status of remaining scheduled closings (.2); prepare environmental property questionnaire responses for receivership properties (7600 S Kingston and 7656 S Kingston) in connection with application for commercial extended coverage (.4); read and revise proposed responses to counsel for institutional lender regarding status of receivership properties (8332-58 S Ellis) (.2); read and respond to letter from title company regarding remaining amounts due in connection with final water bill issued for receivership property (5618 S King) (.1); teleconference with prospective new title insurerregarding issues associated with preparation of title commitment for single-family home portfolio (.5); prepare correspondence to receivership brokers associated with single-family home portfolio regarding preparation formarketing effort (.2).

**Asset Disposition** 

JRW 0.10 Review court order regarding intervenor's motion (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

11/18/2020 KMP

0.20 Review bank records to confirm receipt of proceeds from sale of property (816 S Marquette) and communicate with J. Rak regarding same.

Asset Disposition

JRW

1.00 Exchange correspondence with A. Porter regarding status of marketing of properties (single-family portfolio) (.1); exchange correspondence and pull documentation filed in support of claims against property (1108 Bingham) (.3); confer with A. Watychowicz regarding calculation of appeal deadlines and related review of appellate court rules (7600 Kingston, 7656 Kingston, 6949 Merrill, 1131 E 79th, 6250 Mozart) (.4); review intervenor's reply memorandum and related correspondence with M. Rachlis and K. Duff (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).

**Asset Disposition** 

JR 5.50 Review ledger, delinquency report and update certified rent roll for closing (816 E. Marquette) (.7); attend closing (816 E. Marquette) (3.3); exchange correspondence with all parties regarding confirmation of closing (816 E. Marquette) (.2); call with K. Duff and A. Porter relating to status of single family home portfolio and plan of action (.5); request updated due diligence documents from property management for single family homes (.1); prepare tax declaration form and forward to closer regarding property (816 E. Marquette) (.3); review motion and exchange correspondence with A. Porter regarding motion to confirm sale (1102 Bingham) (.3); review email from E. Duff and provide requested settlement statement from prior closings (6558 S. Vernon and 5618 S. Martin Luther King) (.1).

11/18/2020 AEP

3.50 Read and respond to e-mail inquiry from counsel for prospective purchaser of receivership property (4611 S Drexel) regarding anticipated timing of closing and remaining legal obstacles thereto (.1); review and reconcile preliminary closing statement in connection with closing of sale of receivership property (816 E Marquette) (.1); read and respond to request from K. Duff for additional information pertaining to termination of contract to purchase receivership property (8326-58 S Ellis) (.1); review administrative orders entered in proceedings affecting current and former receivership properties (6558 S Vernon, 7600 S Kingston, 7656 S Kingston, and 7109 S Calumet), update tracking spreadsheet, and disseminate to counsel for purchasers (.2); prepare e-mail to title underwriter enclosing and explaining spreadsheets containing information pertaining to single-family home portfolio (.2); review and analyze proposed rent prorations, compute water prorations, and perform final review of settlement statement in connection with closing of receivership property (816 E Marquette) and issue approval to escrow agent (.4); research and respond to K. Duff regarding earnest monies deposited by defaulted purchaser of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (.1); read and respond to e-mail from K. Duff regarding request for information pertaining to original termination of contract to purchase receivership property (8326-58 S Ellis) (.1); read and respond to purchaser of receivership property (7701 S Essex) regarding management company failure to deliver all keys to property (.2); teleconference with K. Duff and J. Rak regarding final preparation for initiation of marketing of single-family home portfolio (.4); (Continued in next entry)

**Asset Disposition** 

AEP

(Continued from previous entry) Teleconference for title company underwriter regarding issues associated with preparation of title commitments for single-family home portfolio (.3); prepare preliminary draft of motion to confirm sale of receivership property (1102 Bingham) (1.3).

**Asset Disposition** 

AW 0.10 Attention to third party reply in support of motion to stay and share same with counsel (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

AW

0.20 Communicate with J. Wine regarding appellate court rules relating to docketing statement and related deadlines and update docket (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

11/19/2020 KMP

0.60 Study correspondence from asset holder regarding potential disbursement of assets and prepare draft response to same (.4); communicate with E. Duff and J. Rak regarding property manager's final reports for sold properties (8201 Kingston, 7749 Yates) and forward reports (.2).

11/19/2020 AW

3.40 Attention to rule to show cause entered in third party appeal, notify counsel, and update docket (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); proofread and cite-check motion to dismiss intervenor's appeal, prepare table of contents and table of authorities, and communicate with counsel regarding same and timing (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.9); further revisions to motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); finalize motion to dismiss intervenor's appeal, file with the court, and serve as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.1).

**Asset Disposition** 

JR 3.70 Review email from property management regarding single family home due diligence documents (.1); review uploaded documents regarding same and further exchange correspondence with property management relating to missing items (.3); further review email from property manager requesting buyer information for closed properties (7442 S.Calumet, 7701 S. Essex and 816 E. Marguette) and provide same (.2); review email from K. Duff related to October statements and previous closings (5618 S. King and 6558 S. Vernon) and respond accordingly (.1); review income and loss statements received from the property manager and update electronic files related to single family homes (1.1); review emails and follow up correspondence with buyer and buyer's counsel regarding status of tenant notices related to property (4533 S. Calumet) (.2); finalize tenant notice letters for property in anticipation for closing (4533 S. Calumet) (.9); review leases andupdate certified rent roll for anticipated closing (4533 S. Calumet) (.8).

**Asset Disposition** 

AEP 0.30 Read reply in support of motion to stay sales of receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) pending appeal and prepare e-mail to counsel for prospective purchasers regarding timing.

**Asset Disposition** 

JRW 2.60 Work with K. Duff and M. Rachlis on multiple revisions of motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6494 Merrill) (2.3); check record citations in same (7600 Kingston, 7656 Kingston, 6494 Merrill) (.3).

**Asset Disposition** 

MR 3.50 Further work on motion to dismiss intervenor's appeal and follow up regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).

11/20/2020 JR

2.70 Review requested due diligence reports and update electronic files for single family portfolio from property management (.3); finalize review of leases for property (4533 S. Calumet) and update rent roll for closing (.4); review subsidy agreements and update rent roll for closing (4533 S. Calumet) (.4); exchange correspondence with property management requesting missing leases and subsidy agreements for property (4533 S. Calumet) (.2); review updated utility statements requestedfrom property management and update electronic files in preparation for marketing of single family homes (1.3); exchange correspondence with property management requesting missing utility statements regardingsingle family homes (.1).

**Asset Disposition** 

MR 3.30 Attention to bidding procedures on single family homes and follow up (.5); participate in appellate court mediation with intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8).

Asset Disposition

AEP 1.10 Teleconference with K. Duff regarding outcome of mediation with defaulted buyer of receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) and issues associated with marketing of single-family homes (.3); teleconference with K. Duff and receivership brokers regarding discrepancies in values of single-family homes as between receivership broker and special servicer for institutional lender (.2); teleconference with K. Duff, receivership brokers, and counsel for institutional lenders regarding pricing considerations, timing of commencement of marketing, and allocation issues associated with single-family home portfolio (.6).

**Asset Disposition** 

11/21/2020 AEP

5.50 Review all relevant background pleadings, contract documents, and correspondence, read intervenor's motion for order regarding disposition of earnest money, prepare first draft of statement of facts to opposition memorandum, and assemble all relevant exhibits (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

11/22/2020 MR

2.40 Work to review and revise response on motion for escrow monies, research regarding same, and attention to various emails regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

AEP 6.70 Legal research regarding disposition of earnest money associated with receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill), draft, revise, and forward to K. Duff for final review and filing.

11/23/2020 JRW

1.60 Multiple revisions of response brief in opposition to motion for return of earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

ΑW

2.00 Attention to memorandum regarding third party motion for earnest money deposits, draft template declaration in support of memorandum, proofread and cite-check memorandum, and email counsel regarding proposed revisions (7600 Kingston, 7656 Kingston, 6949 Merrill) (.9); multiple revisions to declaration and memorandum as per review and emails from J. Wine, K. Duff, and M. Rachlis (7600 Kingston, 7656 Kingston, 6949 Merrill) (.7); finalize memorandum, declaration, and exhibits, file documents with the court, and follow up with counsel regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.4).

**Asset Disposition** 

JR

4.30 Review income and loss statements received from property management related to single family homes and update electronic files (.4); exchange correspondence with property management and request additional property reports for single family homes (.2); review email from property management regarding requested documents for closing and respond accordingly (4533 S. Calumet) (.1); review email and requested documents from property management and update electronic files (.2); review email from K. Duff requestingan addendum to contract for property (638 N. Avers), draft same and respond to K. Duff accordingly (.2); draft notices to tenant letters and update lien waiver to property manager in anticipation for closing (4317 S. Michigan) (.5); exchange correspondence with property management (M. Abraham at PSR) requesting execution of same (4317 S. Michigan) (.1); follow up correspondence with property management requesting missing leases and subsidy agreements for property (4533 S. Calumet) in preparation for closing (.1); review leases, subsidy agreements, security deposits and update certified rent roll in anticipation for closing (4317 S. Michigan) (1.1); exchange correspondence with the property management team requesting additional missing leases, subsidy agreements and property reports in preparation for closing (4317 S. Michigan) (.2); draft transfer declaration form for property (7656 S. Kingston) (.3); draft transfer declaration form for property (4533 S. Calumet) (.3); draft transfer declaration form for property (4317 S. Michigan) (.3); review email from property management regarding requested property reports in preparation for closing, update electronic files and update certified rent roll (4317 S. Michigan) (.3).

Asset Disposition

AEP

0.70 Read through correspondence relating to filing of sur-reply in connection with lender motions to stay sales of receivership properties pending appeal (1131-41 79th, 6250 Mozart) (.1); review title commitment for receivership property (1422 E 68th) and prepare response to buyer's counsel regarding deletion of special exceptions and judicial obstacles to closing (.3); read

correspondence from counsel for purchaser of receivership property (4533 S Calumet), revise and transmit preliminary seller figures, and provide notice of potentially substantial prepaid rent credits (.3); respond to M. Rachlis e-mail regarding various issues associated with draft motion to confirm sale of receivership property (7237-43 S Bennett).

Asset Disposition

11/23/2020 MR

5.30 Further review and work on response to intervenor's motion regarding escrow monies, and follow up on same and exchange of variousemails regarding same with K. Duff, J. Wine and A. Watychowicz (7600 Kingston, 7656 Kingston, 6949 Merrill) (4.8); attention to motion to approvesale of (7237 Bennett) property (.5).

**Asset Disposition** 

11/24/2020 AW

0.30 Serve memorandum regarding motion for earnest money as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); request pleadings upload to receivership web page.

**Asset Disposition** 

JR 2.70 Review email from title company water department regarding statusof application (4533 S. Calumet) (.1); further correspondence with the property manager regarding additional requests for processing of same (4533 S. Calumet) (.2); review requested leases and subsidy agreements from property management, update electronic files and update certified rent roll in preparation for closing (4317 S. Michigan) (.6) further correspondence with property manager requesting further clarification of same (4317 S. Michigan) (.1); review due diligence documents requested from property management for single family homes (.4); further correspondence with property management requesting same for single family homes (.1); review email from property management regarding requested due diligence documents for property in preparation for closing (4533 S. Calumet) and update electronic files (.2); finalize mailings for notice letter to tenants in anticipation of delivery to tenants post-closing (4317 S. Michigan, 4533 S. Calumet, 6949 S. Merrill, 7600 S. Kingston, 7656 S. Kingston) (1.0).

Asset Disposition

AEP 0.80 Read e-mail from counsel for prospective purchaser of receivership property (4533 S Calumet), prepare preliminary computations of prepaid rent and water credits based on review of utility bills and prepare response thereto (.4); review all attorney examiner worksheets received from title insurer in connection with conveyance of single-family home portfolio, update portfolio spreadsheet, and inventory missing worksheets (.4).

Asset Disposition

MR 0.50 Attention to intervenor issues (7600 Kingston, 7656 Kingston, 6949Merrill).

11/25/2020 JR

3.20 Review single family home portfolio and due diligence documents and update rent roll related to updated utility statements, leases and security deposit information.

**Asset Disposition** 

**AEP** 

0.40 Correspondence with title company regarding rescheduling of closings of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (.1); review proposed renewed brokerage agreement relating to prospective sale of single-family home portfolio and prepare e-mail to broker requesting additional changes and explanation for certain deletions (.3).

**Asset Disposition** 

11/26/2020 AEP

0.80 Legal research regarding finality of receivership sales (.5); read and respond to e-mail inquiry from counsel forpurchaser of receivership property (4611 S Drexel) regarding status of administrative actions and judgments (.3).

Asset Disposition

11/28/2020 AEP

0.30 Review portfolio spreadsheet and prepare e-mail to K. Duff regarding remaining properties (7237 S Bennett) and issue relating to property.

Asset Disposition

11/29/2020 AEP

2.80 Begin preparation of purchase and sale agreement for single-family home portfolio (2.2); review all due diligence folders for properties in single-family home portfolio, remove unnecessary documents, and create final checklist of property-specific issues (.6).

**Asset Disposition** 

11/30/2020 JRW

0.50 Review public notice and related communications with K. Duff and A. Porter (1102 Bingham) (.2); review contract for sale of property (1102 Bingham) and related exchange with K. Duff regarding consolidated motion (.1); review docketing statement and statement of issues on appeal and related review of appellate docket (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).

**Asset Disposition** 

JR

7.40 Review email from A. Porter regarding single family home due diligence documents and respond accordingly (.1); review email from property management regarding requested updated due diligence documents and water meter information (4533 S. Calumet), update electronic files and update rent roll in anticipation for closing (1.5); exchange corrrespondence

with the title company providing water meter information for same (4355 S. Calumet) (.2): finalize notice to tenant letters for closing (4533 S. Calumet) (.4); review email from A. Porter regarding closings (7600 Kingston, 7656 S. Kingston) and request information for same (.2); follow up correspondence with property management regarding document request for closing (4317 S. Michigan) (.1); exchange correspondence with the title company providing all documents in preparation for closing (4533 S. Calumet) (.2); review email from J. Wine regarding draft motion of court approval of property expenses and provide requested information for property (5618 S. MLK) (.2); review email from K. Pritchard and provide requested closed property report (.1); review due diligence documents for single family home (.6); telephone call with A. Porter and K. Duff regarding property closings (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.5); prepare and finalize all documents for closings (4533 S. Calumet, 6949 S. Merrill) (2.9); exchange correspondence with K. Duff requesting execution of closing documents related to properties (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.1); exchange correspondence with property manager requesting property reports in preparation for closing (6949 S. Merrill) (.2); exchange correspondence with property management requesting property reports in anticipation of closing (7600 Kingston, 7656 S. Kingston, 4317 S. Michigan) (.1).

**Asset Disposition** 

11/30/2020 MR 0.50 Attention to property sales and management.

**Asset Disposition** 

AEP 0.60 Tel

0.60 Teleconference with property manager regarding property management issue (.3); teleconference with J. Rak regarding final closing and document execution issues associated with scheduled conveyances of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (.3).

**Asset Disposition** 

SUBTOTAL: 230.20 56410.00]

Business Operations

11/2/2020 KMP

0.20 Follow up on status of receipt of insurance settlement funds for property claim (638 Avers) and communicate with K. Duff regarding same.

**Business Operations** 

ED 1.70 Email correspondence with accountants regarding property manager reporting receivership financial records, and details relating to property restoration and reimbursement completed through September 2020 (.7);

Date	Indiv	Hours	Description
			review and analysis of relateddocuments (1.0).
			Business Operations
11/2/2020	JRW	0.40	Review medical records regarding personal injury claim (7110 S Cornell) and related summary to K. Duff and A. Porter.
			Business Operations
	AW	0.90	Review list of former EquityBuild online vendors provided by K. Duff, research regarding notices of receivership to same and preserved data, and detailed response to K. Duff.
			Business Operations
11/3/2020	KMP	1.70	Communicate with EB team and insurance brokers regarding payment notice (.2); prepare payment for security services company in connection with fire at property (638 Avers) and communicate with K. Duff and J. Rak regarding same (.3); begin collecting and downloading documents from property managers (1.2).
			Business Operations
	AW	0.60	Communicate with A. Porter regarding recorded mortgage documents (8043 S Hermitage) (.1); attention to notice from insurance company, research regarding same, and communicate with K. Duff and J. Wine regarding same (.2); communicate with counsel regarding corporate issues (.3).
			Business Operations
11/4/2020	KMP	1.70	Continue collecting and downloading documents from property manager's electronic data file (.9); review information and documents on property manager's portal and communicate with K. Duff regarding same (.8).
			Business Operations
	ED	0.50	Review financial reporting documents from property managers relating to properties (.3) and email correspondence with K. Duff regarding same (.2).
			Business Operations
	JRW	0.30	Attention to administrative orders (6250 S Mozart, 7109 S Calumet, 7750 S Muskegon) (.2); email exchange regarding LLCs (.1).
			Business Operations

<u>Date</u>	<u>Indiv</u>	Hours	Description
11/4/2020	AW	1.10	Prepare list of pending motions and timeline of sales motions and exchange correspondence with K. Duff regarding same.
			Business Operations
11/5/2020	KMP	0.90	Prepare spreadsheet tracking receipts and expenses for property account (638 N Avers) and communicate with K. Duff regarding same.
			Business Operations
	ED	0.60	Email correspondence with accountant regarding information needed for preparation of property reports (.3); review reporting from property managers to identify relevant documentation (.3)
			Business Operations
11/6/2020	KMP	2.60	Work on spreadsheet detailing property tax payments made by Receiver from inception of receivership and communicate with K. Duff and J. Rak regarding same.
			Business Operations
	ED	1.40	Continue review of property manager reporting for preparation of reports (.3) and email correspondence with accountants and property manager regarding same (.4); review and analysis of financial reporting relating to properties (.4), and email correspondence with K. Duff regarding comments and proposed revisions (.2); email correspondence with lender's counsel regarding access to property (7109 S Calumet) for inspection by appraiser (.1).
			Business Operations
	JRW	0.20	Exchange settlement correspondence with city counsel regarding administrative proceedings (431 E 42nd PI) and related communication with K. Duff and A. Porter.
			Business Operations
11/9/2020	KMP	3.00	Effectuate blast email service for reply in support of tenth motion to approve property sales (.6); work on analysis of payments to property managers for property expenses (2.4).
			Business Operations
	JRW	0.60	Conference call with K. Duff and M. Rachlis regarding potential claim (7110 S Cornell).
			Business Operations

Date Indiv Ho	ours Description
11/9/2020 MR	0.60 Attention to personal injury matter (7110 Cornell) and conferences regarding same with J. Wine and K. Duff.
	Business Operations
11/10/2020 KMP	3.20 Further work on analysis of payments to property managers for property expenses.
	Business Operations
ED	0.10 Email correspondence with accountants and property manager regarding information stillneeded for preparation of June reporting.
	Business Operations
JRW	1.40 Prepare motion to set aside default (4611 S. Drexel), finalize and file (.6); research and email exchange with A. Porter regarding notice of violation (1449 N. Talman) (.4); exchange correspondence with city counsel regarding settlement of administrative proceeding (431 E 42nd Pl) (.1); exchange correspondence with plaintiff's counsel regarding claim (7114 S Cornell) (.2); review administrative court orders (5001 S Drexel) and confer with A. Watychowicz regarding docketing (.1).
	Business Operations
AEP	0.20 Read e-mail from J. Wine regarding latest administrative action filed against receivership entities, research title to non-receivership property (1449 N Talman) and prepare response to J. Wine regarding suggestion for obtaining dismissal of receivership defendants (.2).
	Business Operations
11/11/2020 KMP	0.70 Prepare form for transfer of funds for payment of insurance premium funding and communicate with K. Duff and bank representative regarding same (.4); communicate with loss management service provider regarding status of insurance settlement checks for property damage (638 Avers) (.3).
	Business Operations
11/12/2020 KMP	0.20 Follow up on transfer of funds for payment of insurance premium funding and communicate with K. Duff and bank representative regarding same.
	Business Operations
ED	0.50 Review and respond to K. Duff inquiry regarding real estate taxes (.1) and review analysis of related financial documentation (.2); email correspondence with J. Rak and with accountants to identify and share financial reporting information necessary for completion of remining June accounting reports (.2).
	Business Operations

11/13/2020 KMP

ED

2.40 Analysis of property manager's October reporting and year-to-date accounts payable (1.2); annotate AP spreadsheet for specific properties (638 Avers (.3), 1401 109th (.4)) in connection with same; compile supporting documentation relating to same (.5).

**Business Operations** 

1.20 Email correspondence with accountants and J. Rak regarding revisions to drafts of June reports, and steps to begin preparation of July reports (.3); email correspondence with lender's counsel and property manager regarding arrangements for access to property (6217 S Dorchester) for purposes of lender appraisal (.2); email correspondence with K. Duff regarding inquiry from lender's counsel (.3) and review and analysis of related records (.4).

**Business Operations** 

JRW 0.20 Attention to settlement negotiations (431 E 42nd Pl).

**Business Operations** 

AW 0.70 Review and update motion chart and communicate with J. Wine regarding same.

**Business Operations** 

11/17/2020 KMP

1.10 Work on analysis of funds expended for property expenses, in connection with anticipated motion for restoration.

**Business Operations** 

JRW 0.20 Exchange correspondence with A. Porter and K. Duff regarding water bill for sold property (5618 S MLK) and motion for approvalof same (.1); confer with K. Duff regarding corporate issue (.1).

**Business Operations** 

AW 0.40 Attention to notices from administrative court regarding properties (416 E 66th, 7109 S Calumet, 2527 E 76th, 7600 S Kingston, 2514 S 77th, 7656 S Kingston).

**Business Operations** 

11/18/2020 AW

0.10 Attention to multiple notices regarding violations (431 E 42nd Pl) and update docket.

**Business Operations** 

11/19/2020 KMP

0.20 Communication with insurance broker to inquire regarding premium refund check.

**Business Operations** 

ED 0.50 Email correspondence with accountant, K. Pritchard, and J. Rak regarding additional reporting information required for preparation of July property reports.

**Business Operations** 

JRW 0.60 Review administrative orders (7656 S Kingston, 7600 S Kingston, 7109 S Calumet, 6558 S Vernon) and confer with A. Watychowicz regarding docketing of same (.2); correspondence to A. Porter and K. Duff regarding settlement of claims and administrative orders (431 E 42nd Pl., 4611 S Drexel) (.4).

**Business Operations** 

11/20/2020 KMP

0.20 Communication with insurance adjuster to inquire regarding status of settlement check from insurer (638 N Avers).

**Business Operations** 

ED 0.30 Email correspondence with lender's counsel regarding requested property access for appraisals (7255 E Euclid, 4611 SDrexel) (.1); review of property reporting from property managers regarding sold properties (6558 S Vernon, 4618 S MLK) in order to respond to inquiryfrom lender's counsel (.2).

**Business Operations** 

JRW 0.30 Exchange correspondence regarding tenant issue (4520 S Drexel) (.1); settlement of state court action (.1); correspondence to City attorney regarding judgment order (431 E 42nd PI) (.1).

**Business Operations** 

MR 0.20 Attention to requests on various issues on properties (4520 Drexel, 6558 Vernon and 7749 Yates).

**Business Operations** 

11/23/2020 ED

0.20 Email correspondence with property manager and lender's counsel regarding arrangements for property access for lender's appraiser (7255 S Euclid, 4611 S Drexel).

**Business Operations** 

Date Indiv Ho	ours Description
11/23/2020 MR	0.20 Attention to email regarding property (5618 King Drive).
	Business Operations
11/24/2020 KMP	0.30 Communicate with K. Duff regarding accounting for insurance settlement payments for property damage (638 N Avers) and expenses claimed by property manager for same property (638 N Avers).
	Business Operations
ED	0.60 Email correspondence with property manager and lender's counsel regarding arrangements for property access for lender's appraiser (7255 S Euclid, 4611 S Drexel) (.3); email correspondence with accountant and J. Rak regarding review andrevision of July accounting reports and preparation of draft August reports (.3).
	Business Operations
JRW	0.60 Correspondence to City of Chicago ownership dispute division regarding notice of code violation (1449 N Talman) and injunction against proceedings.
	Business Operations
11/25/2020 KMP	0.40 Prepare request form for transfer of funds to financing company for insurance premium installment payment, and communicate withbank representatives and K. Duff regarding same.
	Business Operations
JRW	1.70 Review nonsuit order (1449 N. Talman) and related email exchange (.1); drafting of motion to use funds from property accounts for payment of property-related expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S Drexel, 5618 S MLK) (1.6).
	Business Operations
11/27/2020 AEP	0.20 Review orders entered in third-party litigation and preparee-mail to K. Duff regarding need to continue stay order.
	Business Operations
11/30/2020 KMP	2.30 Prepare spreadsheet identifying account balances for certain sold properties (7749 Yates, 8201 Kingston, 8047 Manistee, 7051 Bennett, 431 E 42nd Place, 4520 Drexel) and communicate with J. Wine and J. Rak regarding same (1.2); work on spreadsheet identifying property expenses (1.1).

**Business Operations** 

## Indiv Hours Description Date 11/30/2020 JRW 1.90 Review administrative court notices (7456 Saginaw, 431 E 42nd Pl, 1449 N. Talman) and related email to A. Watvchowicz and A. Porter (.1): exchange correspondence with K. Duff and K. Pritchard regarding corporate issue (.2); related correspondence to and telephone conference with accountant (.3); draft motion for approval to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S Drexel, 5618 S MLK) and related communications with J. Rak and K. Pritchard regarding sales proceeds and payments (1.2); related telephone conference with escrow agent (5618 S MLK) (.1). **Business Operations** SUBTOTAL: [42.30 9180.001 Case Administration 11/2/2020 AW 0.20 Attention to SEC filing and communicate with counsel regarding same (.1); attention to third party appeal filings and communicate with counsel regarding same (.1). Case Administration 11/4/2020 AW 0.30 Communicate with J. Wine regarding scheduled conferences and process before same (.1); research and email exchange with counsel regarding notification issue (.2). Case Administration 11/5/2020 AW 0.50 Email counsel regarding December 17, 2020 hearing (.1); communicate with J. Wine regarding upcoming deadlines in matter and create comprehensive spreadsheet containing all future deadlines (.4). Case Administration 11/9/2020 AW 0.80 Communicate with K. Duff regarding updates to receivership web page (.1);

0.80 Communicate with K. Duff regarding updates to receivership web page (.1); attention to notices and orders submitted in District Court and Appellate Court, notify counsel regarding same, and update docket (.6); correspond with K. Pritchard regarding mailinglist and logistics of serving pleadings on claimants (.1).

Case Administration

11/10/2020 AW

0.40 Start preparation of pleadings for receivership update (.2); attention to administrative court order and notice of hearing and email J. Wine regarding same (.2).

Case Administration

11/11/2020 AW

1.10 Complete preparation of pleadings for Receivership webpage update and contact IT consultant with request for update.

Case Administration

11/13/2020 KMP 0.30 Attention to deposit of insurance settlement checks (638 Avers).

Case Administration

AW 0.20 Communicate with counsel regarding double filing by mortgagees and issues with potential future reference (1131 E 79th, 6250 Mozart) (.1) and order regarding December 17, 2020 hearing and logistics for same (.1).

Case Administration

11/17/2020 JRW 0.30 Review and comment on docketing reports and upcoming deadlines.

Case Administration

AW 0.40 Create deadline calendar.

Case Administration

11/18/2020 AW

0.80 Review updated receivership web page and request additional revisions from IT consultant (.1); review docket and request additional upload of pleadings to EquityBuild webpage (.5); revisions and updates to EquityBuild docket (.2).

Case Administration

SUBTOTAL: [ 5.30 778.00]

#### Claims Administration & Objections

11/2/2020 JRW

3.70 Review various claimant inquiries and draft standard update regarding status of claims process (1.3); review claimsagainst property (6217 S Dorchester) and related analysis (.3); correspondence to K. Duff and M. Rachlis regarding plan for distributing claims forms and supporting documentation (.2); attend virtual meeting with database vendor regarding proposal (1.0); related review of proposal and scheduling of training session (.3); exchange correspondence with M. Rachlis regarding standard response to claimant inquiries (.2); research claims and revise response to claimant inquiries (.4).

Claims Administration & Objections

AW 4.60 Attention to numerous emails from claimants, review same, communicate with J. Wine and K. Duff regarding proposed responses and solutions, respond to number of claimants (3.4); revisions to master claims list (.3); request database updates based on claimants' emails (.2); review status

reports and communicate with K. Duff regarding master claims list and formats of same (.5); exchange communications with counsel regarding discovery requests to investors (.2).

Claims Administration & Objections

11/2/2020 MR

9.00 Work on response to motion to stay (1131 E 79th, 6250 Mozart) (7.9); attend meeting with vendor regarding proposal (1.0); attention to other communications on claims library and issues regarding distribution of claims information (.1).

Claims Administration & Objections

11/3/2020 JRW

1.70 Attention to claimant inquiries (.1); review and revise draft communication to claimants providing update regarding status of claims process and related correspondence with K. Duff and M. Rachlis (1.1); study correspondence from proposed document vendor (.2); related analysis to K. Duff and M. Rachlis (.2) and correspondence fromclaimant's counsel (.1).

Claims Administration & Objections

AW 3.90 Draft email responses to claimant and work with J. Wine and K. Duff on revisions to same (.1); work on review, update to claims, responses to claimants and communicate with claims vendor regarding necessary updates to database (3.1); attention to mortgagees' docketing statement filed at appellate court, research regarding deadlines, and communicate with counsel regarding same (1131 E 79th, 6250 Mozart) (.3); email exchange with K. Duff regarding information provided to claimants (.1); revise update for claimants and email exchange with counsel regarding same and response to proposed revisions (.3).

Claims Administration & Objections

MR 8.50 Further work on response to motion to stay and related motion for certification (1131 E 79th, 6250 Mozart) (8.0); attention to issues regarding intervenor and review emails regarding same (.3); attention to correspondence regarding email update on status and issues regarding proposed document vendor (.2).

Claims Administration & Objections

11/4/2020 AW

0.50 Attention to appeal documents filed by third party and communicate regarding same with counsel (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1); review claims and communicate with K. Duff and J. Wine regarding claimant's request for updates (.1); email exchange with claims vendor regarding updates to database (.1); follow up with K. Duff and J. Wine regarding claimants' email (.2).

Date	Indiv	<u>Hours</u>	Description
11/4/2020	MR	6.60	Research and work on issues regarding motion for certification of issues for appeal (1131 E 79th, 6250 Mozart) (3.0); work on further review and edits to response to motion to stay brief (1131 E 79th, 6250 Mozart) (3.0); confer with J. Wine regarding communications with court and preparations for hearing (.3); further preparation for upcoming hearing on motion to stay (1131 E 79th, 6250 Mozart) (.3).
			Claims Administration & Objections
11/5/2020	JRW	1.50	Attend training session with e-discovery vendor (1.0) and related telephone and email correspondence with M. Rachlis and A. Watychowicz (.5).
			Claims Administration & Objections
	AW	0.50	Communicate with J. Wine and K. Duff regarding revisions to update email to claimants (.1); draft lengthy email to claimant who requested contact information for claimants' counsel who filed appearance in matter (.4).
			Claims Administration & Objections
	MR	2.80	Further prepare for and participate in hearing on motion to stay (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.9); attention to issues regarding upcoming filings and rules regarding same (.6); attend meeting on EB claims library (1.0) and follow up regarding same with J. Wine and A. Watychowicz (.3).
			Claims Administration & Objections
11/6/2020	JRW	1.70	Attention to claimants' counsel's request for proofs of claims, study related information, and exchange correspondence regarding same (.5); telephone conference with A. Porter and K. Duff regarding claims and liens against property (6217 S Dorchester) (.8); study analysis of priority dispute (6217 S Dorchester) and exhibits (.4).
			Claims Administration & Objections
	MR	2.40	Work on response brief and affidavit in support of reply on tenth sales motion.
			Claims Administration & Objections
11/8/2020	MR	2.00	Attention to motion to dismiss in appellate court and rules and issues regarding same (1131 E 79th, 6250 Mozart).
			Claims Administration & Objections
11/9/2020	JRW	3.00	Attention to responding to claimant inquiries (.9); related exchange with M. Rachlis (.2); correspondence to K. Duff and M. Rachlis regarding claims process (.4); research regarding appellate procedure and related email to team (1131 E 79th, 6250 Mozart) (.6); conference call with A.Porter, K. Duff and M. Rachlis regarding claims process and discovery of EquityBuild documents (.5); review court order regarding claims process motion and related telephone conference with claimants' counsel (.2) and exchange

with K. Duff and M. Rachlis (.2).

Claims Administration & Objections

11/9/2020 AW

3.80 Communicate with K. Duff and J. Wine regarding various emails from claimants (.4); attention to emails from claimants, review claims, and respond to numerous emails from claimants (3.4).

Claims Administration & Objections

MR

6.00 Further work on motion to dismiss and research regarding same (1131 E 79th, 6250 Mozart) (4.9); attention to communications regarding claims process (.4); conference calls regarding claims process with K. Duff, A. Porter, and J. Wine (.5); attention to order on stay motions (.2).

Claims Administration & Objections

11/10/2020 JRW

1.70 Work on modified claims process for discussion with claimants' counsel (.8); correspondence with A. Watychowicz regarding claim against properties (6217 S Dorchester and 1414 E 62nd Place) (.2); attention to claimant inquiries (.7).

Claims Administration & Objections

ΑW

1.10 Continue review of claims and responding to claimants' requests for updates (.6); communicate with K. Duff and J. Wine regarding proposed responses to claimants (.4); request upload of documents for claimant explaining claimed amounts (.1).

Claims Administration & Objections

JR

0.30 Review email from K. Duff related to lender counsel inquiry regarding 3rd quarter status report and property proceeds (8326-52 S. Ellis) and provide requested information and documents regarding same.

Claims Administration & Objections

MR

6.80 Continue work on motion to dismiss (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

11/11/2020 JRW

2.10 Review proposal from (.1) and telephone conference with database vendor regarding process for distribution of claims documentation (.3); attention to updating proposed claims process based onintervening court rulings (1.1); revise standard discovery requests per court's oral rulings (.5); email exchange with A. Porter regarding claims against property (6217 S Dorchester) (.1).

11/11/2020 AW

0.40 Communicate with J. Wine regarding revised response to claimant, claimant's comments, and claimant's estate issues (.2); respond to emails from claimant (.2).

Claims Administration & Objections

MR 0.20 Attention to issues regarding claims and issues on property (6217 Dorchester).

Claims Administration & Objections

11/12/2020 JRW

1.00 Email exchange with M. Rachlis and K. Duff regarding claimants' request for claims documentation (.2); search proofs of claim for claimant and secondary contact name (.1); work with A. Watychowicz on identifying number of claimants and related review ofprior analyses (.7).

Claims Administration & Objections

AW 2.50 Research and communicate with M. Rachlis regarding draft docketing statement for Receiver and response to statement of the issues (1131 E 79th, 6250 Mozart) (.2); work with K. Duff, M. Rachlis, and J. Wine on motion to dismiss appeal (1131 E 79th, 6250 Mozart) (1.3); communicate with counsel regarding reactions from claimant to opposition to motion to stay (.1); create list of unique claimants (.9).

Claims Administration & Objections

MR 2.60 Attention to reply on motion to stay and follow up on other issues regarding motion to dismiss and communications regarding same with K. Duff (1131 E 79th, 6250 Mozart) (2.0); attention to recent Seventh Circuit filings on statement of issues and draft docketing statement and follow up regarding same with A. Watychowicz (1131 E 79th, 6250 Mozart) (.4); attention to email exchange with K. Duff and J. Wine regarding claims documents (.2).

Claims Administration & Objections

11/13/2020 JRW 2.90 Review and revise draft motion to dismiss appeal (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

AW 1.40 Research regarding and communicate with counsel regarding appellate procedures, draft disclosure, and timing (1131 E 79th, 6250 Mozart) (.6); fact check motion to dismiss appeal and communicate with counsel regarding record cites (1131 E 79th, 6250 Mozart) (.8).

11/13/2020 MR 0.70 Telephone conference with SEC (.5); attention to issues regarding production of claims materials (.2).

Claims Administration & Objections

11/16/2020 KMP

3.90 Work with EB team on motion to dismiss appeal, disclosure and appearance, and docketing statement, including numerous revisions to same, compiling exhibits, completing tables of authorities and contents, and preparing motion and related materials for filing (1131-41 79th, 6250 Mozart) (3.6); file motion, docketing statement, and appearance with Seventh Circuit (1131-41 79th, 6250 Mozart) (.3).

Claims Administration & Objections

MR 0.70 Conference with SEC and K. Duff (.5);conference with K. Duff on appeal (.2).

Claims Administration & Objections

11/17/2020 JRW

0.20 Email exchange with A. Porter and related research regarding claim (.1); confer with M. Rachlis regarding response to claimants' motion for protective order (.1).

Claims Administration & Objections

ΑW

0.70 Review transcript information sheet submitted by appellants, update transcript sheet, and communicate same to counsel (1131-41 79th, 6250 Mozart).

Claims Administration & Objections

11/18/2020 JRW

4.60 Review K. Duff outline regarding claims process and related communications with K. Duff and M. Rachlis (.3); review proposal from potential e-discovery vendor (.2) and related telephone conference with claimants' counsel (.5); correspondence to vendor regarding proposal for EquityBuild documents (.2); revise standard discovery requests to investors in accordance with court's oral rulings (.4) and correspondence to claimants' counsel regarding same (.1); legal research for response toclaimants' motion for protective order (2.3); study claims against properties (6217 S Dorchester and 1408 E 62nd) (.6).

Claims Administration & Objections

ΑW

0.40 Respond to claimant's email regarding claims (.1); follow up with K. Duff and J. Wine regarding responses to claimants (.1); attention to order regarding response to motion to dismiss appeal, forward to counsel, and docket deadline (1131 E 79th, 6250 Mozart) (.1); communicate with M. Rachlis regarding upcoming mediation and email mediator participants' contact information (.1).

D . 4	
Date Indiv Hours Desc	rimilon

11/18/2020 MR

7.20 Conferences with SEC (.5); conferencewith K, Duff (.4); attention to order (.1); further work on motion to dismiss intervenor's appeal (5.3); communications and preparation for upcoming mediation (.5); review of brief filed by intervenor and follow up regarding same (.4).

Claims Administration & Objections

11/19/2020 JRW

0.40 Exchange correspondence with K. Duff regarding claimant inquiry (.2); review motion for protective order and confer with M. Rachlis regarding same(.2).

Claims Administration & Objections

ΑW

0.20 Communicate with J. Wine regrading change of custodian for one of claimants and revise master claims list accordingly (.1); communicate with appellate court regarding scheduled mediation (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).

Claims Administration & Objections

MR

2.00 Prepare for mediation and review materials regarding same (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (1.7); conference with J. Wine regarding response to motion for protective order and related items and review of same (.3).

Claims Administration & Objections

11/20/2020 AW

0.80 Respond to emails from claimants regarding claims process (.2); review and revise master claims list as per claimants' emails and request same updates and uploads from claims vendor (.6).

Claims Administration & Objections

MR

1.40 Participate in appellate court mediation with lender claimants (1131 E 79th, 6250 Mozart) (.6); preparation for mediation (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.6); attention to claims process issues (.2).

Claims Administration & Objections

11/21/2020 JRW

1.90 Correspondence with potential vendor regardingclaims process (.1); legal research and drafting of response to claimants' motion for protective order (1.8).

11/22/2020 JRW 3.90 Drafting of opposition to motion for protective order.

Claims Administration & Objections

11/23/2020 JRW

6.30 Legal research and drafting of response to motion for protective order (5.9); draft response to claimant inquiry and related communications with A. Watychowicz and K. Duff (.2); exchange correspondence with claimant's counsel regarding claims process (.2).

Claims Administration & Objections

AW 0.30 Follow up with K. Duff and J. Wine regarding repeated emails from claimant and respond to same (.1); research regarding decisions in support of objection to institutional lenders' motion for protective order and email J. Wine regarding same (.2).

Claims Administration & Objections

MR 1.60 Attention to opposition to motion for protective order (1.3); attention to emails regarding claims process issues (.2); attention to correspondence from claimant (.1).

Claims Administration & Objections

11/24/2020 JRW

4.10 Additional legal research for response to motion for protective order (1.8); review redlines, further revise, and finalize same for filing (1.7); exchange correspondence with A. Watychowicz and K. Duff regarding response to claimant inquiry (.2); review correspondence from e-discovery vendor regarding procedure for entering confidentiality agreement (.1); exchange correspondence with counsel for claimants' regarding claims documentation and related exchange with K. Duff and M. Rachlis (.2); review transcript of October 27 proceedings (.1).

Claims Administration & Objections

AW 2.80 Communicate with K. Duff and J. Wine regarding email from non-claimant and respond to same (.2); attention to opposition to motion for protective order, proofread same, and email counsel regarding revisions (1.4); multiple revisions of same, finalize opposition, file with court, and serve as per service list (1.2).

Claims Administration & Objections

MR 3.10 Work on brief in opposition to motion for protective order, review and revise same, and review decisions regarding same (2.8); attention to status on claims issues (.3).

Claims Administration & Objections

11/25/2020 JRW

4.10 Work with M. Rachlis and K. Duff on updated claims process (3.5); review court order and transcript regarding court's oral and written interim rulings regarding claims process, draft correspondence to claimants' counsel

<u>Date</u> Indiv Ho	ours D	Description
		regarding claims process, and related discussion with K. Duff (.6).
		Claims Administration & Objections
11/25/2020 MR	4.00	Attention to draft summary of claims process and issues (.5) and participate in meeting regarding claims process with K. Duff and J. Wine (3.5).
		Claims Administration & Objections
11/30/2020 JRW	1.90	Study master spreadsheet regarding rollover claims and related analysis to K. Duff (.3); review claims forms for examples of rollover documentation (1.3); review SEC response to motion to dismiss appeal (1131 E 79th, 6250 Mozart) (.1); review appellants' response to motion to dismiss (1131 E 79th, 6250 Mozart) (.2).
		Claims Administration & Objections
MR	1.30	Attention to emails regarding claims process (.5); attention to appellate brief (1131 E 79th, 6250 Mozart) (.8).
		Claims Administration & Objections
SUBTOTAL:		
Tax Issues	_	
11/17/2020 AW	0.30	Organize 1099-S forms for multiple properties and forward to K. Pritchard with instructions from K. Duff.
		Tax Issues
11/19/2020 KMP	0.30	Forward various forms 1099-S to accountants relating to sale of properties (5618 MLK, 6355 S Talman, 8209 S Ellis, 2736 W 64th, 7051 S Bennett, 7201 S Constance, 7957 Marquette, 6356 California, 3074 Cheltenham, 6554 Vernon).
		Tax Issues
11/30/2020 KMP	0.20	Communicate with J. Wine regarding status of state agency tax notices for certain entities.
		Tax Issues

Other Charges			
	Description	_	
Asset Disposition			
	Publication of notice for 11th motion to approviates	е	600.00
SUBTOTAL:		[	600.00]
Business Operations			
	Software licenses (Google - \$96.00; InSynq - \$266.50)		362.50
	Photocopies for November 2020		346.70
	Online research for November 2020		1,454.16
SUBTOTAL:		[	2,163.36]
Total Other Charges			\$2,763.36

Summary of Activity

	Hours	Rate	
Jodi Wine	76.50	260.00	\$19,890.00
Ania Watychowicz	54.20	140.00	\$7,588.00
Justyna Řak	110.00	140.00	\$15,400.00
Kathleen M. Pritchard	30.80	140.00	\$4,312.00
Andrew E. Porter	56.80	390.00	\$22,152.00
Ellen Duff	7.60	390.00	\$2,964.00
Michael Rachlis	100.10	390.00	\$39,039.00

## **SUMMARY**

Legal Services	\$111,345.00 \$2,763.36
Other Charges  TOTAL DUE	\$2,703.30 \$114,108.36
TOTAL DOL	φ114,100.30

# Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 132 of 182 PageID #:20401 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

February 15, 2021

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622129

Legal Fees for the period December 2020 \$105,905.50

Expenses Disbursed \$679.92

Due this Invoice \$106,585.42

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Accounting/Auditing			
12/2/2020	KMP	3.50	Balance ledgers for Receiver's to online bank records (.3); work on schedules of receipts and disbursements for October and November 2020 (1.6); work on analysis of paid property expenses for April-November 2020, including identifying supporting documentation (1.6).
			Accounting/Auditing
12/3/2020	KMP	2.50	Reconcile online bank records to identify recent transactions (.7); update ledger for certain Receiver's accounts to conform to online bank records (.3); review bank statements for numerous Receiver's accounts (1.5).
			Accounting/Auditing
12/9/2020	KMP	0.20	Record recent transactions to account ledgers for Receiver's accounts.
			Accounting/Auditing
12/23/2020	KMP	0.20	Communicate with K. Duff and bank representative regarding reports for property account balances.
			Accounting/Auditing
12/24/2020	) KMP	0.20	Communicate with bank representative regarding reports for property account balances.
			Accounting/Auditing
SUBTOTAL:			[ 6.60 924.00]
Asset Analysis & Re	covery	<u>/</u>	
12/3/2020	JR	4.70	Review email from accounting firm and further correspond with E. Duff regarding reporting for August (.1); produce all reports received from accounting firm and complete review (4.6).
			Asset Analysis & Recovery
12/4/2020	JR	1.10	Finalize August report review.
			Asset Analysis & Recovery
12/8/2020	AEP	0.20	Teleconference with K. Duff regarding remaining potential claimsto be filed in receivership action.
			Asset Analysis & Recovery

<u>Date Indiv</u>	Hours Description
12/30/2020 MR	0.80 Attention to potential asset.
	Asset Analysis & Recovery
12/31/2020 AW	0.30 Attention to asset statements submitted by defendants, along with email exchanges and notes and email K. Duff and M. Rachlis regarding same.
	Asset Analysis & Recovery
MR	0.20 Further Attention to information relating to potential asset.
	Asset Analysis & Recovery
SUBTOTAL:	[ 7.30 1322.00]

#### **Asset Disposition**

12/1/2020 JR

7.00 Exchange correspondence with property management regarding final reports needed for closings (6949 S. Merrill and 4533 S.Calumet) (.3); attend closing of property (6949 S. Merrill) (2.5); attend closing (4355 S. Calumet) (2.9); review email from property manager, update electronic files and request additional reports for closings (4317 S. Michigan 7600 S. Kingston and 7656 S. Kingston) (.2); final preparation of documents for closings (4317 S. Michigan 7600 S. Kingston and 7656 S. Kingston) (.7); exchange correspondence with buyer producing all leases and subsidy contracts related to sale of property (4533 S. Calumet) (.2); exchange correspondence with buyer's counsel producing all leases and subsidy contracts related to sale of property (6949 S. Merrill) (.2).

**Asset Disposition** 

AEP

3.70 Reconcile final draft of putative certified rent rolls associated with closing of receivership property (6949 S Merrill), discuss open issues with J. Rak, and prepare final proposed prepaid rent credit and rent prorations (.5); review water bills associated with receivership property (6949 S Merrill), reconcile with ledger card, and prepare utility proration (.2); communications with M. Rachlis and K. Duff regarding status of closings and implications of receipt of judicial order staying same (.1); communication with prospective purchaser of receivership properties (7600 S Kingston, 7656 S Kingston) regarding inquiry into potential existence of judicial order prolonging stay of closings (.1); teleconference with former EquityBuild title insurer regarding status of hold harmless indemnity associated with prospective sale of receivership property (7656 S Kingston) (.1); reconcile final drafts of certified rent roll associated with receivership property (4533 S Calumet), compute final proposed prepaid rent credit and rent prorations, and transmit same to counsel for purchaser with explanation (.3); prepare proration agreement governing post-closing collection of rents at receivership property (4533 S Calumet) (.3); read final communications between counsel for purchaser of receivership property (6949 S Merrill) and escrow agent to ensure proper execution of all documentation (.1); correspondence with counsel for purchaser of receivership property (4533 S Calumet) regarding demand for additional rent credits (.2); review final settlement statement for closing of receivership property (4533 S Calumet) (.1); review all documentation in files

pertaining to receivership property (1102 Bingham), reorganize same, and prepare closing checklist (.8); update closing figures for sales of receivership properties (7600 S Kingston, 7656 S Kingston) and submit to escrow agent (.5); prepare and submit closing figures for sale of receivership property (4515 S Michigan) (.4).

Asset Disposition

12/1/2020 MR

0.20 Attention to closing issues (7600 Kingston, 7656 Kingston and 6949 Merrill) and communications regarding same.

**Asset Disposition** 

12/2/2020 KMP

0.40 Review online bank records to confirm receipt of proceeds from sales of property (6949 S Merrill, 4533 S Calumet) and communicate with K. Duff and J. Rak regarding same (.2); confirm wire instructions for sale of property (4317 S Michigan) with K. Duff and J. Rak (.2).

**Asset Disposition** 

JR 8.50 Follow up email to property management requesting property reports for closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.1); telephone call with A. Porter regarding closing (4317 S. Michigan) (.3); attend closing (4317 S. Michigan) (3.3); exchange correspondence with broker requesting confirmation of wire instructions (4317 S. Michigan) (.1); review property reports and update rent rolls related to prorations and provide credits to buyer related to sales (7600 S. Kingston and 7656 S. Kingston) (2.1); exchange correspondence with K. Duff, K. Pritchardand broker advising of closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.2)

**Asset Disposition** 

AEP

2.30 Review draft settlement statements for receivership properties (7600 S Kingston and 7656 S Kingston) and transmit corrections to escrow agent (.1); communications with escrow agent regarding involuntary dissolution of entity and effect of federal receivership order (.1); review water ledgers for receivership properties (7600 S Kingston and 7656 South Kingston) and communicate discrepancies to escrow agent (.2); communications with escrow agent, J. Rak, and former title company regarding release of escrowed funds associated with closing of sale of receivership property (4315 S Michigan) (.2); prepare waived title in connection with sale of receivership property (4315 S Michigan) (.2); prepare affidavits for execution by K. Duff in connection with buyer request for certain endorsements for receivership properties (7600 S Kingston and 7656 SKingston) (.3); review final proposed certified rent roll and rent prorations associated with sale of receivership property (4515 S Michigan) (.1); review final water balance information pertaining to sale of receivership property (4315 S Michigan), update closing figures, and authorize inclusion of same onsettlement statement (.1); final review of settlement statement associated with sale of receivership property (4315 S Michigan) (.1); review final rent rolls in connection with closings of receivership properties (7600 S Kingston and 7656 S Kingston) (.3); read purchase and sale contract for receivership property (1102 Bingham) to complete creation of closing checklist and research status of local property tax liens in connection with continued preparation of motion to confirm sale (.6).

12/2/2020 MR 0.50 Attention to issues on property sales (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

12/3/2020 KMP

0.60 Review online bank records to confirm receipt of proceeds from sales of property (4315 Michigan, 7600 Kingston, 7656 Kingston) and communicate with K. Duff and J. Rak regarding same (.2); finalize notice of sales (7600 Kingston, 7656 Kingston, 6949 Merrill) and file same with court, and confer with A. Watychowicz regarding same (.4).

**Asset Disposition** 

JRW 0.60 Exchange correspondence with A. Porter and K. Duff regarding eleventh motion to confirm sales (.2); place publication notice (.2); review and comment on notice of property sales involved in claimants' motion to stay and review updated draft (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).

Asset Disposition

JR 0.50 Exchange correspondence with K. Pritchard regarding closed property related to property insurance (.1); exchange correspondence with the property management team regarding closed properties (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.1); update electronic files with all property reports received from property manager from closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.3).

**Asset Disposition** 

AW 0.70 Work with K. Duff, M. Rachlis, and J. Wine on notice of sale and opposition to third party motion to stay (7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to time stamped notice and supplement and serve as per service list (.3).

**Asset Disposition** 

MR 0.40 Further review and follow up on intervenor's filing regarding properties (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); review request regarding (1700 Juneway) property (.1).

**Asset Disposition** 

12/4/2020 JR

5.10 Review previously delivered delinquency report and exchange correspondence with property management requesting current delinquency report for single family home portfolio (.3); review email from A. Watychowicz regarding request for sale amount of properties (6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) and provide requested documents (.2); review previously requested rent rolls, leases, subsidy contracts and delinquency reports for single family homes, update master rent roll and request additional missing items from property management (1414 East 62nd Place, 1418 East 62nd Place, 1017 W 102nd Street, 1516 E

85th Place, 2136 W 83rd Street, 417 Oglesby Avenue, 7922 S Luella Avenue, 7925 S Kingston Avenue, 7933 S Kingston Avenue, 8030 S Marquette Avenue, 8104 S Kingston Avenue, 8403 S Aberdeen Street, 8405 S Marquette Avenue, 8529 S Rhodes Avenue, 8800 S Ada Street, 9212 S Parnell Avenue, 10012 S LaSalle Avenue, 11318 S Church Street, 3213 S Throop Street, 3723 W 68th Place, 406 E 87th Place, 61 E 92nd Street, 6554 S Rhodes Avenue, 6825 S Indiana Avenue, 7210 S Vernon Avenue, 7712 S Euclid Avenue, 7953 S Woodlawn Avenue, 8107 S Kingston Avenue, 8346 S Constance Avenue, 8432 S Essex Avenue, 8517 S Vernon Avenue, 2129 W 71st Street, 9610 S Woodlawn Avenue, 5437 S Laflin Street, 6759 S Indiana Avenue, 1401 W 109th Place, 310 E 50th Street, 6807 S Indiana Avenue) (4.6).

**Asset Disposition** 

12/4/2020 AEP

2.60 Communications with J. Wine regarding procedural issues associated with timing of filing motions to confirm sales of additional receivership properties (7237 S Bennett, 1102 Bingham) (.1); work on response to motion to vacate sales of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (2.5).

Asset Disposition

AW 1.30 Legal research regarding motion to dismiss and response filed in appellate court (1131 E 79th, 6250 Mozart).

**Asset Disposition** 

MR 0.20 Attention to intervenor's filing regarding stay of sales (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

12/6/2020 AEP

3.00 Draft memorandum in opposition to motion to vacate sales of receivership property (6949 S Merrill, 7600 S Kingston, 7656 S Kingston), continue legal research regarding various points of law, proofread, edit, and revise first draft, and transmit same to receiver.

**Asset Disposition** 

2.30 Work on reply to intervenor's stay motion (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

12/7/2020 JRW

MR

0.90 Review and revise draft motion to vacate sales (7600 Kingston, 7656 Kingston, 6949 Merrill) (.8); review draft eleventh motion to confirm sales (7237 Bennett) (.1).

**Asset Disposition** 

JR 6.00 Review email from property management and provide required closing documents from closings of properties (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.2); review master rent roll for single family homes and exchange correspondence with A. Porter regarding same (.3); review

leases for security deposit information related to single family homes (1.3); exchange correspondence with property management inquiring about a security deposit for tenant (8403 Aberdeen) (.1); review closing documents for various properties and organize electronic files (4317 S. Michigan, 7701 S. Essex, 7656 S. Kingston, 7600 S.Kingston, 6949 S. Merrill, 4533 S. Calumet) (2.1); conference call with A. Porter related to single family portfolio status (.7); exchange correspondence with property management requesting updates to due diligence documents for single family homes (.1); review updated utility bills for single family homes and update electronic files regarding same (1.2).

**Asset Disposition** 

12/7/2020 AW

1.70 Communicate with K. Duff regarding notice of sale filed with court (7600 Kingston, 7656 Kingston, 6494 Merrill) (.1); work with K. Duff, J. Wine, and M. Rachlis on revisions and finalization of opposition to motion to vacate, file with court (7600 Kingston, 7656 Kingston, 6494 Merrill) (1.6).

**Asset Disposition** 

AEP 0.50 Proofread, edit, and revise drafts of proposed motion to vacate (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

MR 1.80 Attention to emergency motion by intervenor and various exchanges regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

12/8/2020 JRW

0.20 Email exchange regarding placement of publication noticefor single family portfolio.

**Asset Disposition** 

JR
6.20 Review utility statements received from property management for single family homes and update electronic files (1.6); exchange correspondence with property management regarding same (.1); review additional due diligence documents received from property management for single family homes and update electronic files (2.7); review and analyze ledgers for single family homes against rent roll and confirm rental income consistency in preparation for marketing and providing documents to potentialbuyers (1.7); review email from brokerage firm regarding requested due diligence documents for single family homes and respond accordingly (.1).

Asset Disposition

AW 0.30 Attention to time stamped opposition to third party motion to vacate sales and serve as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill).

12/8/2020 AEP

1.50 Teleconference with property manager regarding property management issues (.2); teleconference with K.Duff regarding property management (.3); continue editing, revising, and customizing purchase and sale contract for single-family home portfolio and review all litigation files to ascertain current status of all administrative and housing court proceedings (1.0).

**Asset Disposition** 

12/9/2020 JR

6.90 Review emails from property management and update master rent roll with requested property information for single family homes (.3); review updated income and profit statements, compare and analyze expenses with updated utility statements provided by property management for single family portfolio in preparation for production to potential buyer (6.3); exchange correspondence with A. Porter regarding same (.3).

**Asset Disposition** 

**AEP** 

1.20 Teleconference with J. Rak regarding discrepancies between monthly utility bills and operating expenses and possible strategies for fixing issues prior to producing due diligence documents associated with sale of single-family homes (.3); review proof of notice of public sale in connection with advertisement of single-family home portfolio (.1); read tax sale notice received from Cook County Clerk and prepare e-mail to title underwriter confirming mootness (431 E 42nd Pl) (.2); review notice of violation on receivership property (6250 S Mozart) and forward same to prospective purchaser with explanation (.1); review settlement statements from numerous recent closings of receivership properties and update portfoliospreadsheet with relevant data (.3); read e-mail from J. Wine regarding claims submitted against properties in single-family home portfolio and update portfolio spreadsheet accordingly (.2).

**Asset Disposition** 

MR

0.50 Attention to intervenor's motion and issues for response and begin drafting same (7600 Kingston, 7656 Kingston, 6949 Merrill).

**Asset Disposition** 

12/10/2020 KMP

0.20 Communicate with K. Duff, A. Porter, J. Wine and J. Rak regarding unpaid water bill balance subsequent to property closing (4553 S Calumet) and potential solutions.

Asset Disposition

**JRW** 

1.40 Review draft eleventh motion to confirm sales and work with M. Rachlis and K. Duff to revise (7237 Bennett) (.5); review and comment on draft opposition to appellant's motion to extend briefing schedule (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); review proof of claim and related correspondence with A. Porter (7237 Bennett) (.2); email exchanges with K. Duff and A. Porter regarding revisions to eleventh motion to confirm sales (7237 Bennett) (.4).

12/10/2020 JR

6.10 Finalize review of the income and profit statements and analyze information in electronic files in preparation for production to single family homes potential buyers (1.7); exchange correspondence with property management team requesting missing property utility statements for single family homes to resolve discrepancies (.3); exchange correspondence with brokerage firm and inquire about uploading requested single family homes information pertaining to same (.1); organize all due diligence documents including leases in preparation for production to brokerage firm related to single family homes (1.3); final review of single family homes master rent roll regarding same and make finalupdates to electronic files (1.6); exchange correspondence with A. Porter regarding same (single family homes) (.3); review email from the title company regarding water balance for previously sold property (4533 S. Calumet) and respond accordingly (.1); further communication with K. Pritchard, A. Porter and K. Duff regarding same (.2); additional communication with the City of Chicago water department requesting explanation to high water balance for property (4533 S. Calumet) (.5).

#### **Asset Disposition**

AEP

1.90 Teleconference with property manager regarding management issue (.2); read and respond to e-mail inquiry from counsel for prospective purchaser of receivership property (4611 S Drexel) regarding current status of judicial proceedings and potential closing timetable (.1); teleconference with J. Rak regarding overage of water invoices following sale of receivership property (4533 S Calumet) and finalization of rent roll associated with single-family home portfolio (.2); proofread, edit, and revise final draft of eleventh motion to confirm sales (7237 Bennett) (.3); prepare summary of redemption of property taxes associated with receivership property for counsel to various investor-lender claimants (.1); prepare e-mail to K. Duff regarding issues associated with water bill for receivership property (4533 S Calumet) (.1); prepare response to broker of single-family homes regarding finalization of due diligence materials and status of rent roll (.1); review all tenant ledgers and other documents added to due diligence folder for single-family homes, reorganize certain file structures and review and approve final rent roll (.8).

#### Asset Disposition

MR 4.00 Further work on reply to intervenor's motion (7600 Kingston, 7656 Kingston, 6949 Merrill) (3.0); attention to 11th motion to approve sales and work with K. Duff and J. Wine regarding same (1.0).

**Asset Disposition** 

12/11/2020 KMP

0.30 Work on draft motion to approve property sales and communicate with J. Wine regarding same (7237 Bennett).

**Asset Disposition** 

**JRW** 

1.20 Revisions to and correspondence with A. Porter regarding eleventh sales motion (7237 Bennett) (.7); telephone conference with A. Porter regarding eleventh sales motion (7237 Bennett) (.4); correspondence to court clerk regarding proposed order granting remainder of ninth sales motion (.1).

12/11/2020 JR

4.40 Exchange correspondence with J. Wine regarding administrative matter related to property (4611 Drexel) and provide requested information (.2); follow up correspondence with City of Chicago water department inquiring about a water bill for property (4533 S. Calumet) (.1); review email related to the order dismissing appeal related to properties (1131 E. 79th and 6250 S. Mozart) (.1); exchange correspondence with A. Porter regarding same and discuss plan for closings of same (1131 E. 79th and 6250 S. Mozart) (.2); exchange correspondence with the title company requesting water applications for processing (1131 E. 79th and 6250 S. Mozart) (.1); review property reports in preparation for sale and request property reports from property manager in anticipation of closing (1131 E. 79th) (.2); review property reports in preparation for sale and request property reports from property manager in anticipation of closing (6250 S. Mozart) (.2); review, update and draft closing documents (1131 E. 79th) in anticipation of sale (2.8); begin updating and drafting closing documents for property in anticipation for sale (6250 S. Mozart) (.5).

Asset Disposition

**AEP** 

0.50 Teleconference with J. Rak regarding remaining discrepancies in single-family home due diligence materials (.1); teleconference with J. Wine regarding nature of property manager claims and sale of receivership property (7237 S Bennett) free and clear of certain liens (.2).

**Asset Disposition** 

12/12/2020 JRW

1.00 Review exhibits and revise consolidated eleventh sales motion (7237 Bennett) (.6) and motion for approval to pay expenses (7749 Yates, 8201 Kingston, 8047-55 Manistee, 7051 Bennett, 431 E 42nd Pl, 4520 Drexel) (.4).

Asset Disposition

0.20 Read judicial orders relating to interlocutory appeals pursued by institutional lenders in connection with ninth motion to confirm sales and update closing checklists.

Asset Disposition

12/14/2020 JRW

**AEP** 

JR

2.20 Revisions and finalization of 11th sales motion and related correspondence with A. Porter, K. Duff and M. Rachlis (7237 Bennett) (1.6); work with K. Pritchard on exhibits to same (7237 Bennett) (.3); review and revise draft proposed order (7237 Bennett) (.1); correspondence from outside counsel for city regarding release of lien (4611 S Drexel) (.1); exchange correspondence regarding proposed order for ninth sales motion (.1).

Asset Disposition

5.50 Review due diligence documents for property and request current property reports from property management (6250 S. Mozart) (.5); review leases, lease terms, lessee name and security deposit information for property

(6250 S. Mozart) (1.6); request additional missing items regarding same from property management (6250 S. Mozart (.2); update certified rent roll regarding same (.8); update and draft closing documents in preparation for sale (6250 S. Mozart) (2.1); telephone call to A. Watychowicz regarding the submission of the Order related to the 9th motion to confirm sale (.3).

Asset Disposition

12/14/2020 AEP

0.80 Proofread, edit, and revise drafts of eleventh motion to confirm sales (7237 Bennett) (.6); prepare e-mail to counsel for property manager regarding filing of eleventh motion to confirm sales (7237 Bennett) (.2).

**Asset Disposition** 

MR

0.90 Attention to various versions on motion on (7237 Bennett) property for approval and other related items and communications regarding same (7237 Bennett) (.8); follow up communications regarding order on 9th motion to confirm (.1).

Asset Disposition

12/15/2020 JR

5.40 Review emails from property management regarding requested property reports and update electronic files related to single family home portfolio (.4); review additional master rent roll and update sale related to single family homes (.5); review closing documents and exchange correspondence with A. Porter requesting final review of same (1131 E. 79thand 6250 S. Mozart) (.3); draft closing documents in preparation for closing, update closing checklist (7237 S. Bennett) (3.7); exchange correspondence with A. Porter regarding same (7237 S. Bennett) (.1); review email from K. Duff and draft an amendment to contract (638 Avers) (.2); review email from A. Porter and provide requested delinquency report for property (6250 S. Mozart) (.2).

**Asset Disposition** 

AW

0.30 Communicate with K. Duff regarding service of eleventh motion to approve sale (7237 Bennett) (.1); attention to entered orders regarding ninth and eleventh sale motions, and a letter to Judge Lee from claimant forward to counsel, and update docket (.2).

Asset Disposition

**AEP** 

1.10 Read e-mail from property manager regarding prospective tenancy at receivership property (7840 S Yates) and prepare e-mail to counsel for prospective buyer regarding same (.1); finalize first draft of purchase and sale agreement for single-family homes and transmit same to K. Duff and receivership broker for review and comment (.6); read e-mail from counsel for prospective purchaser of receivership property (6250 S Mozart) regarding delinquencies in commercial rents, investigate, and respond thereto (.3); review and approve real estate broker and property manager lien waivers in connection with prospective sales of receivership properties (6250 S Mozart, 1131 E 79th) (.1).

JR

12/16/2020 SZ

0.40 Review accounting firm records for information related to EIN for corporate entity in connection with sale of property (6250 Mozart) and exchange correspondence regarding same.

**Asset Disposition** 

4.10 Finalize lien waiver for closings and provide to broker for execution in anticipation of sale (1131 E. 79th and 6250 S. Mozart); review closing confirmation and update electronic files of same (1131 E. 79th and 6250 S. Mozart) (.1); update notices to tenants and property manager lien waivers and exchange correspondence with buyer requesting approval and signature of same in anticipation of closing (1131 E. 79th and 6250 S. Mozart) (.8); review judicial order approving sale of properties and update closing checklists and closing documents regarding same (1131 E. 79th and 6250 S. Mozart) (2.9); exchange correspondence with property management providing closing details and requesting property reports for closing (1131 E. 79th and 6250 S. Mozart) (.3).

**Asset Disposition** 

AW 0.60 Email exchanges with counsel regarding email to claimants notifying of eleventh motion to confirm sale (7237 Bennett) (.2); serve by email eleventh motion to approve sale on all claimants (7237 Bennett) (.4).

**Asset Disposition** 

AEP 0.50 Exchanges of e-mail with counsel for purchaser of receivership property (6250 S Mozart) regarding necessity of estoppel certificates, review lease files, review and revise proposed drafts supplied by buyer's counsel, and prepare e-mail to property manager regarding urgency of execution (.4); miscellaneous e-mails with K. Duff, J. Rak, and escrow agent regarding planning for closings of receivership properties (6250 S Mozart, 1131 East 79th) (.1).

**Asset Disposition** 

12/17/2020 JR

5.60 Update electronic files related to closing documents for property in preparation for closing (1131 E. 79th) (.6); exchange correspondence with property management requesting execution of notices to tenants regarding upcoming closing (6250 S. Mozart) (.2); review property sale price information and generate report related to same, resolve a discrepancy (.9); draft closing documents for property (638 N. Avers, 1422 E. 68th, 2800 E. 81st, 4611 S. Drexel, 4750 S. Indiana, 6217 S. Dorchester, 7024 S. Paxton, 7109 S. Calumet, 7237 S. Bennett, 7255 S. Euclid, 7840 S. Yates) (3.9).

**Asset Disposition** 

AEP 8.30 Prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by corporate entity.

12/18/2020 JR

6.60 Exchange correspondence with broker regarding allocation values of the single family homes (.2); exchange correspondence with accounting firm about completion of various 1099 forms related to the single family homes for different entities (.3); followup correspondence with the City of Chicago water department requesting an update on the water bill for property (4533 S. Calumet) (.2); draft water applications for single family homes (4.1); draft closing documentsfor unsold properties (7024 S. Paxton, 7109 S. Calumet, 7237 S. Bennett, 7255 S. Euclid, 7840 S. Yates) (1.8).

**Asset Disposition** 

**AEP** 

1.00 Teleconference with J. Rak regarding preparation for sales of single-family home portfolio and all issues associated with deed preparation, applications for transfer stamps, and value allocations on title commitments (1.0); prepare e-mail to wireless carrier regarding need for estoppel certificate in connection with closing of sale of receivership property (6250 S Mozart) (.1); prepare e-mail to retail tenant regarding need for estoppel certificate in connection with closing of sale of receivership property (6250 S Mozart) (.1); prepare amended estimate of closing costs for conveyance of receivership property (638 N Avers) (.2).

**Asset Disposition** 

12/19/2020 AEP

5.20 Prepare preliminary seller's figures in connection with prospective conveyance of receivership property (6250 S Mozart) (.4); review and revise draft closing documents, and prepare additional closing documents, in connection with conveyance of receivership property (6250 S Mozart) (1.2); prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by certain corporate entities (3.6).

Asset Disposition

12/20/2020 AEP

4.50 Prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by corporate entity and for additional receivership property (1414-18 E 62nd Place).

**Asset Disposition** 

MR

0.80 Review information on property (638 Avers) and draft analysis and response to same (.6); review materials regarding same (638 Avers) (.2).

Asset Disposition

12/21/2020 KMP

0.20 Study communication from J. Rak confirming outstanding amount due for utility payment from recent closing on sale of property (4533 S Calumet) and confer with K. Duff regarding same.

12/21/2020 JR

6.20 Review emails from E. Duff and accounting firm and produce requested sold property report (.1); review email from the title company and provide requested information regarding closing documents related to all single family homes (.1); review water statements and exchange correspondence with J. Wine, K. Duff and K. Pritchard related to final water payment for previously sold property (4355 S. Calumet) (.2); follow up correspondence with the title company confirming the final water bill amount for payment (4355 S. Calumet) (.1); begin drafting closing checklist for single family homes in preparation for closing (.8); exchange correspondence with A. Porter related to an estoppelcertificate regarding upcoming closing (6250 S. Mozart) (.1); exchange correspondence with the title company regarding additional fees and charges for payment of final water bill (4355 S. Calumet) (.3); prepare final closing documents in preparation for closing (1131 E. 79th and 6250 S. Mozart) (3.6); exchange correspondence with A. Porter regarding closings (1131 E. 79th and 6250 S.Mozart) (.5); exchange correspondence with the title company regarding closings (1131 E. 79th and 6250 S. Mozart) (.4); exchange correspondence with property management requesting property reports in anticipation for closing (1131 E. 79th) (.2).

**Asset Disposition** 

AEP

3.30 Teleconference with title company regarding numerous issues associated with preparation of title commitment for single-family home portfolio (.3); teleconference with J. Rak regarding water delinguency on receivership property (4533 S Calumet) (.1); review and revise all draft closing documents in connection with prospective conveyance of receivership property (1131 E 79th) (.9); revise estimated closing costs associated with prospective credit bid conveyance of receivership property (638 N Avers) (.1); review tax proration figures associated with prospective conveyance of receivership property (6250 S Mozart) and send e-mail to escrow agent affirming correctness of receivership computations (.1); additional communications with counsel for prospective purchaser of receivership property (6250 S Mozart) and escrow agent regarding discrepancies in settlement figures (.3); search for and review and analyze corporate documentation and deeds of conveyance associated with properties (7933 S Kingston, 8104 S Kingston, and 8529 S Rhodes), and in connection with finalization of examiner's worksheet and chain of title (1.1); research loan documents and insurance provisions pertaining to casualty at receivership property (638 N Avers) (.2); review worksheets in connection with conveyance of receivership property (638 N Avers) (.2).

**Asset Disposition** 

12/22/2020 KMP

0.20 Communicate with property manager and K. Duff regarding final distribution on sold property (3074 Cheltenham).

**Asset Disposition** 

12/22/2020 JR

7.10 Work with K. Duff and A. Watychowicz on signing of closing documents (6250 S. Mozart and 1131 E. 79th) (1.0); exchange correspondence with property management requesting property documents required for closing (6250 S. Mozart) (.1); exchange correspondence with A. Porter requesting execution of documents needed for closing (6250 S. Mozart) (.2); exchange correspondence with the title company providing order granting sales (1131 E. 79th and 6250 Mozart) (.1); exchange correspondence with property management requesting updated property reports required for closing (6250 S. Mozart) (.2); attend closing (1131 E. 79th) (2.6); attend closing (6250 S. Mozart) (2.4); exchange correspondence with K. Pritchard and the title company regarding payment of final water bill regarding a previously sold property (4533 S. Calumet) (.2); exchange correspondence with property management and title company regarding payment (7656 S. Kingston) (.2); exchange correspondence with broker, K. Duff, K. Pritchard notifying of closed properties (6250 S.Mozart and 1131 E. 79th) (.1).

Asset Disposition

AW 0.40 Work on finalization of closing documents (6250 S. Mozart and 1131-41 E. 79th) with K. Duff and J. Rak.

**Asset Disposition** 

AEP 0.90 Teleconference with J. Rak to inventory all closing documents pertaining to conveyance of receivership properties (6250 S Mozart, 1131 E 79th) (.3); teleconference with J. Rak regarding finalization of water and rent prorations in connection with conveyance of receivership property (1131 E 79th) (.2); final reviews of draft settlement statements associated with closings of receivership properties (6250 S Mozart, 1131 E 79th) (.4).

**Asset Disposition** 

12/23/2020 KMP

0.70 Communicate with J. Rak to confirm receipt of proceeds for sold properties (1131 E. 79th, 6250 Mozart) (.2); communicate with property manager regarding final reconciliations for sold properties (3074 Cheltenham, 7508 Essex, 4520 Drexel, 7110 Cornell, 5450 Indiana, 6437 Kenwood, 7450 Luella) (.5).

**Asset Disposition** 

JR 0.80 Review email from K. Duff and provide requested sold property information for the 3rd quarter 2020 (.2); exchange correspondence with the title company and K. Pritchard regarding the updated waterbalance for property and payment of same (4533 S. Calumet) (.6).

**Asset Disposition** 

12/29/2020 JRW

0.30 Email exchange with K. Duff regarding publication notice of sale (.1); review claimant's objections to 11th sales motion (7237 Bennett) (.2).

Asset Disposition

<u>Date</u> <u>Indiv</u> <u>Ho</u>	urs Description
SUBTOTAL:	1[63.10 37458.00]
Business Operations	<u>.</u>
12/1/2020 ED	0.20 Preliminary review of draft accounting reports for August 2020 prepared by accountant.
	Business Operations
12/2/2020 JRW	1.10 Drafting of motion to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.6); review documentation and related exchange with E. Duff regarding insurance settlement (4520 S Drexel) (.5).
	Business Operations
12/3/2020 KMP	2.80 Review spreadsheet relating to property closings and communicate with insurance broker to advise of recent closings (.2); work onanalysis of paid property expenses for April-November 2020, including identifying supporting documentation (2.6).
	Business Operations
JRW	1.20 Attention to drafting motion to approve payments from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.7); related email exchange with property manager regarding account payable balances (.2) and related telephone conferences with E. Duff (.1) and K. Duff (.2).
	Business Operations
12/4/2020 ED	0.70 Email correspondence with property manager (.1) and lender's counsel (.1) regarding arrangements for property access (7109 S Calumet) for inspection; email correspondence with J. Wine regarding documentation received from lenders (.4); email correspondence with accountant and J. Rak regarding review of draft August accounting reports and preparation of draft September reports (.1).
	Business Operations
KMP	3.30 Work on analysis of paid property expenses for April-November 2020, including identifying and compiling supporting documentation.
	Business Operations
12/7/2020 JRW	0.30 Exchange correspondence with A. Porter regarding administrative proceeding (8405 S Marquette) and related review of files for proof of payment (.2); email exchange with property manager regarding current account balances (7749 S Yates, 8201 S Kingston, 8047 S Manistee, 7051 S Bennett) (.1).
	Business Operations

### Date Indiv Hours Description

12/8/2020 ED 0.30 Review of email correspondence from commercial tenant (6250Mozart) requesting consent to revisions to permitted use (.1); review of existing lease provisions (.1); email correspondence with property manager

regarding same (6250 Mozart) (.1).

**Business Operations** 

JRW 3.00 Study financial statements from property manager (7749 S Yates, 8201 S Kingston, 8047 S Manistee, 7051 S Bennett) and related email exchange regarding same and revision to motion to approve payments from property accounts (2.2); prepare for administrative hearing (4611 S Drexel) and related email exchange with property manager (.6); review standing orders in preparation for upcoming state court hearing (.2).

**Business Operations** 

12/9/2020 KMP

0.70 Prepare request for funds transfer to financing company for payment of insurance premium financing and communications with K. Duff and bank representatives regarding same (.4); briefly review and forward notices regarding property violations (7750 Muskegon, 6250 S Mozart) and tax sale (431 E 42nd) to J. Wine (.3).

**Business Operations** 

ED 2.40 Further email correspondence with lender's counsel and property manager regarding arrangements for property inspection (7109 S Calumet) (.1); email correspondence with lender regarding request for inspection and follow up relating to sale of subject property (6949 S Merrill) (.2); review and analysis of draft April and May accounting reports received from accountant and related financial reporting from property managers (2.1).

**Business Operations** 

**JRW** 4.20 Revise motion for approval of payments out of property accounts and prepare exhibits to same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (1.3); related correspondence with property manager regarding property expenses (.1); review dockets in state court action and related exchange of correspondence with court clerk regarding upcoming hearing (.4); exchange correspondence with property manager regarding evidence for upcoming hearing (4611 Drexel) (.1); exchange correspondence with counsel for partiesto state court action regarding upcoming hearing and proposed order continuing stay (.3); study pleadings in two statecourt matters, prepare notes regarding same, and related exchange of correspondence with A. Porter (7616 S Phillips) (1.5); telephone conference with K. Duff and A. Porter regarding state court actions (.3) and upcoming hearing on motion to set aside default judgment (4611 A Drexel) (.1); email exchange with K. Duff regarding property tax sale (431 E 42nd) (.1).

12/9/2020 AW 0.20 Research regarding complaint and communicate results to J.

Business Operations

Wine.

12/10/2020 ED

3.90 Email correspondence with accountant regarding additional documentation necessary for preparation of September property accounting reports (.1); continue review of June property accounting reports (1.2); begin review of July accounting reports, and analysis of related financial reporting from property managers (2.6).

**Business Operations** 

JRW 1.30 Confer with E. Duff regarding exhibits to motion to approve expenditures (4520 S Drexel) (.2); exchange correspondence with counsel and clerk of court in state court action (.2); appear in state court hearing before Judge Mitchell (7616 S. Phillips) (.5); email exchange with property manager regarding evidence of compliance regarding cited violations (4611 S Drexel) (.1); exchange correspondence with K. Duff and A. Porter regarding payment due to title company (4533 S. Calumet) (.2); review M. Rachlis revisions to draft motion for approval to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.1).

**Business Operations** 

MR 0.50 Status on hearing regarding third party litigation (.1);attention to motion to pay expenses and follow up regarding same (.4).

**Business Operations** 

12/11/2020 KMP

0.30 Work on draft motion to allow payment of expenses and communicate with J. Wine regarding same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel).

**Business Operations** 

JRW 1.70 Appearance in court for administrative hearing and related negotiations with counsel for city (4611 S Drexel) (1.3); correspondence with K. Duff and A. Porter regarding status of administrative matter (4611 S Drexel) (.2); review and docket administrative order (4520 S Drexel) (.1); review order in state court matter (.1).

**Business Operations** 

12/14/2020 KMP

4.70 Further work on consolidated motion to confirm sales and allow payment of expenses, including finalizing motion and exhibits and filing same electronically (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (4.4); communicate with K. Duff, M. Rachlis, A. Porter, and J. Wine regarding same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.3).

Date Individuals Describi	ate Ind	iv Hours	Description
---------------------------	---------	----------	-------------

12/14/2020 AW

0.20 Attention to order entered in other lawsuit and docket new case management call (.1); communicate with J. Wine regarding noticeregarding property (4520-26 S Drexel) (.1).

**Business Operations** 

12/15/2020 KMP

0.20 Follow up with insurance adjuster regarding status of remaining payment on insurance settlement for property damage (638 Avers).

**Business Operations** 

AW 0.30 Communica

0.30 Communicate with K. Duff regarding issue with online platform and attempt to reinstate it (.2); email vendor regarding same (.1).

**Business Operations** 

12/16/2020 ED

2.70 Email correspondence with accountant regarding reflection of restoration transfers in accounting reports (.7), and review of related reporting and financial records (.5); review of accounting reports and related property manager financial reports (1.5).

**Business Operations** 

12/17/2020 KMP

0.60 Communications with asset manager requesting information (638 N Avers) (.2); confer with K. Duff regarding funds requested by property manager for security installations (.2); communications with K. Duff regarding receipt of insurance claim settlement (638 N Avers) and current balance of property account (.2).

**Business Operations** 

ED 1.30 Email correspondence with K. Duff regarding calculation of restoration amounts from property to be sold (638 Avers), and review of relevant financial reports (.4); call with accountant regarding calculation and reporting of restoration amounts from and to properties (.9).

**Business Operations** 

JRW 1.00 Exchange correspondence with counsel for City regarding release of lien, appearance, order granting motion to set aside default and continuance to ownership dispute division (4611 S Drexel) (.4); related emailexchange with A. Porter regarding status of administrative proceedings (4611 S Drexel) (.1); exchange correspondence with A. Watychowicz regarding administrative hearing (4520 S Drexel) (.1); correspondence with property manager regarding filed motion (.1); correspond with J. Rak regarding payment of water bill (4533 S Calumet) (.1); review order in administrative proceeding (7110 S Cornell) and update files regarding same (.2).

12/18/2020 KMP

0.40 Prepare email correspondence to property manager requesting information regarding funds transfers for securityinstallations (7760 Coles, 7237 Bennett) (.2); communicate with K. Duff regarding outstanding expenses for property (638 Avers) (.2).

**Business Operations** 

ED 0.60 Review revised draft reports from accountant, and analysis of applicable calculations and changes (.4) and draft email explaining comments and corrections (.2).

**Business Operations** 

JRW 0.20 Email exchange with counsel for City regarding administrative court proceedings (4611 S Drexel) and related update to A. Porter.

**Business Operations** 

12/21/2020 KMP

0.40 Follow up with K. Duff regarding property manager's response relating to funds transfers for security installations (7760 Coles, 7237 Bennett) (.2); communicate with K. Duff regarding property manager's request for funding of property expenses (1401 W 109th) (.2).

**Business Operations** 

AW

0.40 Communicate with counsel regarding follow up email from company interested in lease (.1); attention to email from online vendor and email K. Duff and J. Wine regarding same and provide background (.2); attention to notices from administrative court (4611S Drexel, 7110 S Cornell) and update docket (.1).

**Business Operations** 

12/22/2020 KMP

0.80 Prepare request forms for funds transfers relating to property manager's request for funding of property expenses (638 N Avers, 1401 W 109th) and communicate with K. Duff and property manager regarding same (.4); prepare request form for funds transfer to financing company for installment on insurance premium financing and communicate with K. Duff regarding same (.2); prepare request form for funds transfer to title company for final payment on utilities for sold property (4533 S Calumet) and communicate with K. Duff and J. Rak regarding same (.2).

**Business Operations** 

JRW 0.90 Review tax notice (1516 E 85th PI), related correspondence with K. Duff, A. Watychowicz, and accountant and revisions to notice letter (.6); review and revise notice letter (638-642 N. Avers) and related correspondence with K. Duff (.3).

12/22/2020 AW

0.20 Attention to original release of judgment (4611 S Drexel) and provide information regarding same to J. Wine and J. Rak (.1); attention to administrative order (6949 S Merrill) and communicate with J. Wine regarding same (.1).

**Business Operations** 

12/23/2020 KMP

0.90 Revise request forms for funds transfers relating to property manager's request for funding of property expenses (638 N Avers, 1401 W 109th) and communicate with K. Duff and bank representatives regarding same (.3); revise request form for funds transfer to financing company for installment on insurance premium financing and communicate with K. Duff and bank representatives regarding same (.2); revise request form for funds transfer to title company for final payment on utilities for sold property (4533 S Calumet) and communicate with K. Duff, J. Rak, and bank representatives regarding same (.2); communicate with insurance broker to provide updated list of sold properties (.2).

**Business Operations** 

12/28/2020 JRW

0.30 Review continuance order and order of default (6250 S Mozart) and related review of files and exchange with A. Porter and A. Watychowicz.

**Business Operations** 

ED 0.40 Email correspondence with accountant and insurance agent regarding updates to schedule of insurable values based on property sales, refunds and adjustments to premium finance agreements, and updates to schedule of properties.

**Business Operations** 

ΑW

0.30 Attention to orders entered in administrative court (6250 S Mozart and 2832 E 63rd) and communicate with J. Wine regarding same (.2); attention to order entered in administrative court (6250 S Mozart and 2832 E 63rd) and update docket (.1).

**Business Operations** 

12/29/2020 JRW

0.20 Review notice of code violation (2129 W 71st St) and related correspondence with A. Porter (.1); correspondence with A. Porter regarding water bill (5618 SMLK) (.1).

**Business Operations** 

ED 0.20 Email correspondence with insurance agent and accountant regarding adjustment of premium finance agreement payments to reflect sold properties, and timing of refundsrelating to same.

**Business Operations** 

AW 0.70 Attention to notices from administrative court and title company (5618 S MLK and 2129 W 71st St) and email counsel regarding same (.1); follow up with J.Wine regarding access to online database (.1); work with IT

Date Indiv Hou	ırs <u>Description</u>		
	consultants to resolve issue regarding access to exe online (.3); work on updates to email notifications g		s stored
	Business Operations		
SUBTOTAL:			11588.00]
Case Administration			
12/7/2020 AW	0.90 Attention to entered order regarding additional apper with counsel (.1); review docket, compile pleadings request update to website (.7); attention to entered and communicate with counsel regarding same (.1)	for website upo order regardin	date, and
	Case Administration		
12/9/2020 AEP	0.40 Read e-mails forwarded by A. Watychowicz and J. Non-receivership property (6801 S East End) and p (.2); teleconference with K. Duff and J. Wine regard filed by owners of non-receivership properties (6801 24 S Phillips) (.2).	repare respons ling status of la	se thereto wsuits
	Case Administration		
12/14/2020 AW	0.20 Attention to orders regarding appeal, dismissal order filed appearances, forward to counsel, and update of		Lee, and
	Case Administration		
12/17/2020 AW	0.20 Attention to returned mail filed with the court and co- counsel regarding same (.1); attention to entered or date andemail counsel regarding same (.1).		
	Case Administration		
12/31/2020 AW	1.10 Prepare pleadings for update to web page and requ	est update.	
	Case Administration		
SUBTOTAL:		[ 2.80	492.00]

### Claims Administration & Objections

12/1/2020 JRW

4.40 Review claims forms and supporting documentation (2.3); related correspondence with K. Duff regarding analysis of same (.3); correspond with K. Duff and revise draft response to claimant inquiry (.2); attention to evaluation of claims process (1.0); related email to and telephone conference with potential vendor regarding process, cost and timing of transfer of claims documentation (.5); related email exchange with database vendor (.1).

12/1/2020 AW

0.60 Email J. Wine regarding rollover authorization form from claimant (.1); finalize response to claimant regarding other claimant's email to multiple individuals (.2); attention to email regarding rollovers and review same columns in master claims sheet (.3).

Claims Administration & Objections

MR 0.20 Attention to claims related issues regarding claims records and rollovers.

Claims Administration & Objections

12/2/2020 JRW

3.20 Work on joint report regarding claims status (2.0); work with A. Watychowicz on claims by tranche sheet (1.2).

Claims Administration & Objections

AW 2.90 Research appellate rules regarding docketing statement, response to same, and motion practice and email M. Rachlis regarding same (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to claims planning outline, prepare tranche oriented spreadsheet, and share with K. Duff and J. Wine (2.3); communicate with K. Duff and J. Wine regarding notice from claimant (.1); attention to voicemail from claimant and communicate with K. Duff regarding same (.1).

Claims Administration & Objections

MR 0.50 Attention to reply to motion to dismiss in appellate court and follow up on same and rules on timing with A. Watychowicz (1131 E 79th, 6250 Mozart) (.3); attention to exchange on open issues on claims process (.2).

Claims Administration & Objections

12/3/2020 JRW

6.10 Continue working on updated claims process and related exchange of correspondence with K. Duff (1.8); conference call with document database vendors regarding plan for distribution of claims documentation to claimants (.4); continued modification of proposed tranches (2.3) and related telephone conference with K. Duff (.4); attention to responding to claimant inquiries (6160 S MLK Ave) (.6); email exchange with claimant's counsel regarding motion for leave to file additional appearances (.2); email correspondence with counsel for claimants (.1); reviewappellate court order and related email exchange (.1).

Claims Administration & Objections

AW 0.40 Research regarding property sales and response to claimant inquiry regarding same (.2); attention to claimants' motion for extension of time to file and forward to counsel (.1); attention to email fromcounsel who represents multiple claimants (.1).

Date Individuals Describi	ate Ind	iv Hours	Description
---------------------------	---------	----------	-------------

12/3/2020 AEP 2.90 Legal research regarding claims.

Claims Administration & Objections

MR 4.20 Attention to appeal issues and reply filing (1131 E 79th, 6250 Mozart) (3.0); attention to issues on claims (.3); conference with claimants' counsel regarding claims process (.9).

Claims Administration & Objections

12/4/2020 JRW

4.30 Complete draft of updated claims process (.9) and related review of prior claims status reports to the court (.7); exchange correspondence with vendor regarding estimate (.1); work with A. Watychowicz on responding to claimant inquiry (.3); exchange correspondence with E.Duff regarding loan issue (.2); correspond with K. Duff, M. Rachlis, and SEC (1.8); draft emails to claimants' counsel regarding claims process (.3).

Claims Administration & Objections

AW 2.50 Update claimant regarding current status of claim (.1); research regarding sale of properties (6356 S California and 1700-08 Juneway) and draft emails to claimant regarding same (.5); research regarding claim and draft response to claimant (.2);research regarding properties (7600 S Kingston, 7656 S. Kingston, 6949 S Merrill) and draft response to claimant (.2); review and confirm completeness of claims and communicate with J. Wine regarding same (.2); review claims process outline and share proposed revisions and comments with J. Wine (1.2); attention to response to comments regarding same (.1).

Claims Administration & Objections

MR 2.00 Review and comment on claims memo and exchange various emails regarding same with J. Wine and K. Duff (1.0); attention to draft appellate reply brief (1131 E 79th, 6250 Mozart) (1.0).

Claims Administration & Objections

12/5/2020 MR 6.70 Further work on appellate reply brief (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

12/6/2020 MR 6.00 Further work on appellate reply brief (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

12/7/2020 JRW
4.30 Attention to responding to claimant inquiries (.3); review and revise draft reply to motion to dismiss appeal and related review of multiple redlines (1131 E 79th, 6250 Mozart) (2.4); legal research for same (1131 E 79th, 6250 Mozart) (1.5); email exchange with claimants' counsel regarding claims process outline (.1).

12/7/2020 AW

4.30 Attention to email from claimant, communicate with K. Duff regarding response, and respond to claimant (.2); follow up with K. Duff regarding lengthy response to claimant's request regarding sold property (7750 S Muskegon) (.1); email exchange with J. Wine regardingfund question (.1); proofread reply in support of motion to dismiss and multiple email exchanges with K. Duff, M. Rachlis, and J. Wine regarding same, prepare table of contents and table of authorities, work on revisions and finalization of same, and file with appellate court (1131E 79th, 6250 Mozart) (3.9).

Claims Administration & Objections

MR 5.00 Further work on reply on appeal and exchange regarding same(1131 E 79th, 6250 Mozart).

Claims Administration & Objections

12/8/2020 KMP

0.50 Draft notice letter to creditor and confer with K. Duff and J. Wine regarding same.

Claims Administration & Objections

**JRW** 

1.40 Exchange correspondence regarding court's order concerning claimants' participation in upcoming hearing (.1); exchange correspondence with document vendor regarding fees fordistribution of claims documentation (.1); study claims against property (7927-49 S Essex) and analysis to A. Porter and K. Duff (.4); work with K. Duff and A. Watychowicz on response to claimant inquiry (.1); exchange correspondence with K. Duff and K. Pritchard regarding potential claim issues (.4); review and revise notice letter (.3).

Claims Administration & Objections

12/9/2020 KMP

0.40 Prepare correspondence regarding notice of receivership to creditor and confer with K. Duff and J. Wine regarding same.

Claims Administration & Objections

**JRW** 

3.20 Attention to claimant inquiries (.3); related review ofclaim submission and state court proceedings (6801 S East End) and prepare notes regarding same (1.7); review motion for extension and related email exchange with K. Duff regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1); confer with K. Pritchard regarding notice letters (.1); review and commenton correspondence from claimants' counsel regarding claims process and update to court (.2); telephone conference with K. Duff and A. Porter regarding claims process (.2); study investor claims against single family residence properties and related analysis to K. Duff and A. Porter (.6).

12/9/2020 AW

0.30 Email response to claimant regarding inquiry about his claims (.1); communicate with K. Duff and J. Wine regarding claimant's participation in scheduled conference (.1); email exchange regarding claimants' inquiries about property manager lawsuit (.1).

Claims Administration & Objections

AEP 0.40 Teleconference with K. Duff and J. Wine regarding claims process, potential scenarios, and research and analysis.

Claims Administration & Objections

12/10/2020 JRW

2.90 Study transcript of proceedings and revise standard discovery requests accordingly (2.2); confer with A. Watychowicz regarding schedule prepared by claimant's counsel (.1); review appearances on file and prepare list of counsel of record (.2); correspond with claimants' counsel regarding separation of properties into tranches (.1); review proof of claim (.3).

Claims Administration & Objections

AW 2.20 Review claims process outline and sample tranche schedule and communicate with J. Wine regarding proposed revisions and comments (1.6); email exchange with K. Duff regarding response to claimant (.1); attention to master claims list and email exchange with J. Wine regarding same (.3); create a list of claimants representedby counsel and communicate same to counsel (.2).

Claims Administration & Objections

MR 0.50 Attention to issues on claims process and follow up regarding same.

Claims Administration & Objections

12/11/2020 JRW

5.80 Review appellate court orders granting motions to dismiss and district court orders regarding stay (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); conference call with K. Duff and M. Rachlis regarding claims process and separation of properties into tranches (1.6); correspondence to court clerk forwarding appellate court orders (.1); compare vendor estimates for claims documentation and related correspondence (.3); draft email to claimant regarding upcoming hearing (.1); revise spreadsheet regarding proposed tranches (3.2); prepare correspondence to SEC (.1).

Claims Administration & Objections

MR 3.50 Review tranches and claims information for upcoming hearing and meeting (1.0); conferences regarding various issues with K. Duff and J. Wine regarding claims process (2.0); attention to court opinions and follow up regarding same (.4) attention to communication with claimant regarding upcoming hearing (.1).

### Date Indiv Hours Description

12/14/2020 JRW

5.10 Attention to responding to claimant inquiries (.5); exchange correspondence with document vendor regarding revised estimate (.2); exchange correspondence with K. Duff and M. Rachlis regarding proposed separation of properties into tranches (.2); review redline and comments from claimant's counsel regarding claims process outline and respond to same (.8); conference call with K. Duff and M. Rachlis regarding claims process (1.8); additional revision of claims process outline (1.4); related correspondence with counsel for claimants (.2).

Claims Administration & Objections

ΑW

1.30 Attention to emails regarding responses to claimants with suggested revisions and respond to claimants (.2);call with J. Wine regrading current master claims list by property, generate same and email J. Wine updated list (.5); research and email exchange with M. Rachlis regarding turnover motion, reconsideration motion, and other pending motions before Judge Lee (.6).

Claims Administration & Objections

MR

3.80 Review of claims process related issues and communications, and exchanges regarding same with various team members and preparation for upcoming hearing (2.0); participate in conference call with K. Duff and J. Wine (1.8).

Claims Administration & Objections

12/15/2020 JRW

6.50 Telephone conference with claimants' counsel regarding joint status report to court and related email exchange with K. Duff and M. Rachlis (.2); confer with team regarding notice to claimants (.2); draft joint status report on claims (1.2); review revisions to standard discovery and related email to claimant's counsel (.1); work with K. Duff and M. Rachlis on revisions to joint status report and outline of procedures (1.1); correspondence with claimant's counsel regarding same (.1);telephone conference with claimant's counsel regarding standard discovery requests (.1); review redline of standard discovery requests and further revise same (.8); study proposed revisions to joint status report from claimants' counsel and related conference with K. Duff and M. Rachlis (.8); additional exchanges of drafts and revision of joint status report, outline of procedures, and standard discovery requests (1.6); exchange correspondence with claimants' counsel and SEC regarding same (.3).

Claims Administration & Objections

AW

1.80 Follow up with K. Duff regarding proposed response to claimants and email claimant (.1); attention to email from claimant requesting update to claim, review claim, and communicate with K. Duff and J. Wine regarding same (.2); review standard discovery requests and revise it as percounsel's forwarded draft (.9); call with J. Wine regarding pending motions (.1);

supplement section of joint claims status report regarding pending motions and email J. Wine regarding same (.5).

Claims Administration & Objections

12/15/2020 MR

4.10 Reviews and work on claims related issues and review various drafts regarding same as well as related matters regarding upcoming hearing (3.3); participate in meeting with K. Duff and J. Wine regarding claims (.8).

Claims Administration & Objections

12/16/2020 JRW

6.40 Exchange correspondence with claimants' counsel regarding joint claims status report (.1); confer with K. Duff and A. Watychowicz regarding claimant inquiries (.2); study transcripts of proceedings regarding claims process (1.1); conference call with claimants' counsel regarding claims process and joint status report (.7); revisions to status report and outline of proceduresfor distribution of claims documentation and EquityBuild documents (1.8); telephone conferences with institutional lender claimants' counsel (.6) and investor lender claimants' counsel (.3) regarding standard discovery requests and related email exchanges and revision of revised requests (.9); exchange correspondence with claimant in follow up to voice message (.1); correspondence to K. Duff and M. Rachlis regarding EquityBuild documents (.2); confer with claimants' counsel regarding quote from vendor and review same (.2); work with A. Watychowicz on filing (.2).

Claims Administration & Objections

AW

1.50 Communicate with K. Duff and J. Wine regarding email to claimant (.1); finalize email to claimant regarding proposed conference call time and email claimant regarding same (.1); attention to email from claimant and communicate with K. Duff and J. Wine regarding same (.1); add signature blocks to joint status report, revise joint status report, finalize and file with the court. (1.1); forward time stamped joint status report to Judge Lee's courtroom deputy (.1).

Claims Administration & Objections

MR

3.00 Further preparation for hearing (2.0); review and follow up on various issues regarding status report and upcoming hearing and submission (1.0).

Claims Administration & Objections

12/17/2020 JRW

2.30 Attention to responding to claimant inquiries (.4); exchange correspondence with claimant's counsel regarding discovery (.1); conference call with K. Duff, M. Rachlis, and SEC (.5); attend court hearing on claims process and outstanding motions (.9); revise agreed confidentiality order and related correspondence courtroom deputy (.2); exchange correspondence with K. Duff regarding supplementation of claims documentation (.2).

### Date Indiv Hours Description

12/17/2020 AW

0.60 Communicate with K. Duff and M. Rachlis regarding notice to claimant regarding upcoming hearing (.1); email claimant telephonic hearing access information (.1); draft email to claimant's spouse regarding needed documents (.2); draft email to claimant and communicate with K.Duff and J. Wine regarding same (.1); email accountant regarding claimants' entities (.1).

Claims Administration & Objections

MR

4.70 Continue preparation for upcoming hearing (3.0); participate in meeting with SEC (.5); attend hearing before Judge Lee (.9); follow up on proposed order (.3).

Claims Administration & Objections

12/18/2020 KMP

0.40 Work on draft notice letter to potential claimant (638 Avers).

Claims Administration & Objections

**JRW** 

2.70 Draft proposed order on claims process (1.8); revise same to incorporate comments from K. Duff and M. Rachlis (.7) and related email to claimants' counsel and SEC (.1); telephone conference with counsel for tenant regarding claim (7110 S Cornell) (.1).

Claims Administration & Objections

MR

0.70 Attention to order on claims and follow up and exchanges regarding same with J. Wine and K. Duff.

Claims Administration & Objections

12/21/2020 JRW

1.00 Attention to responding to claimant inquiries and related telephone conference with A. Watychowicz (.2); telephone conference with claimants' counsel regarding claims process (.2); confer with A. Watychowicz regarding preparation of email service lists and email to vendor regarding same (.2); exchange correspondence with claimant's counsel regarding proposed claims process and order and related review of redlines (.4).

Claims Administration & Objections

AW

1.10 Review claims and correspondence from claimants and respond to same (.4); communicate with K. Duff regarding passing claimant and response to claimant's spouse (.2); call with J. Wine regarding contact lists on property by property basis and communicate with claims vendor regarding same and estimate cost (.3); attention to entered confidentiality order and email counsel regarding same (.1); attention to deadlines set by Judge Lee and update docket (.2).

12/21/2020 AEP

1.40 Teleconference with K. Duff regarding revisions to estimated closing costs associated with prospective credit bid conveyance of receivership property (638 N Avers), including conceptual analysis of potential payment of same from insurance proceeds (.5); further teleconference with K. Duff regarding global claims analysis issues (.6); review final drafts of spreadsheets associated with credit bid on receivership property (638 Avers) and provide comments to K. Duff (.3).

Claims Administration & Objections

12/22/2020 KMP

0.30 Revise and finalize notice letter to potential claimant (638 Avers) and prepare transmittal of same.

Claims Administration & Objections

JRW 2.80 Email exchange regarding EquityBuild documents (.1); review proof of claim documentation and related correspondence with A. Porter (.6); review redlines of proposed order from claimants' counsel, K. Duff and M. Rachlis and further revise same to incorporate comments (1.8); confer with A. Watychowicz and K. Duff regarding responseto claimant inquiry (.1); exchange correspondence with claimant'scounsel and M. Rachlis regarding EquityBuild documents (.2).

Claims Administration & Objections

AW 0.80 Revisions to email to claimant's counsel, communicate with K. Duff and J. Wine regarding revisions, and finalize response email (.2); communicate with K. Duff and J. Wine regarding demand from claimant and proposed response (.2); draft noticeof receivership to collection agency and email K. Duff and J. Wine regarding proposed revisions (.2); assist K. Pritchard in service of notice of receivership (.1); communicate with accountant regarding collection notice (.1).

Claims Administration & Objections

MR 2.10 Further review and revise of draft order on claims and follow up on same andother issues on claims process, and work with K. Duff and J. Wine regarding addressing such issues.

Claims Administration & Objections

12/23/2020 JRW

3.50 Review and reconcile redlines of proposed order and claims process received from claimants' counsel (.5); conference call with claimants' counsel regarding proposed order and claims process (.8); draft response to claimant inquiry and related exchange of correspondence with K. Duff (.4); further revision to proposed order and related exchange of correspondence with K. Duff (.9); telephone conference with document vendor regarding proposal for documents produced in response to standard discovery requests (.2); telephone conference with e-discovery vendor regarding database options and related review of materials and correspondence with M. Rachlis and K. Duff regarding same (.7).

12/23/2020 MR 0.50 Attention to issues on proposed order and other issues on claims.

Claims Administration & Objections

12/24/2020 JRW

3.80 Further revise proposed order based on additional revisions from claimants' counsel (.3); conference call with claimants' regarding proposed claims process (1.5); review claimants' counsel's revisions to claims process outline (.4); conference with K. Duff and M. Rachlis regarding same (.9) and further revision and annotation of outline (.7).

Claims Administration & Objections

0.90 Review orders and attention to claims process issues and participate in meeting with K. Duff and J. Wine.

Claims Administration & Objections

12/28/2020 JRW

MR

4.10 Exchange correspondence with K. Duff regarding claimant inquiry (.2); review claim forms and prepare representative sample (1.1); begin checklist for claim review procedure (.3); review institutional lender claim (.1); revise standard discovery to institutional lenders and related review of October 27 hearing transcript (.2); conference call with K. Duff, A. Porter, M. Rachlis and A. Watychowicz regarding claims process and claims review (2.2).

Claims Administration & Objections

AW 2.70 Confer with K. Duff, M. Rachlis, J. Wine, A. Porter, and J. Porter regarding claims review (2.4); attention to email from claimant and communicate with counsel regarding same (.1); draft follow up correspondence to collection company and request input from K. Duff (.2).

Claims Administration & Objections

AEP 4.00 Conference call with team to discuss legal and factual overview of priority claims and articulate strategy for reviewing and assessing competing claims associated with properties (2.0); create spreadsheets of EBF mortgagees and summaries of internal recordspertaining to each mortgagee's loan balance in connection with receivershipproperties (3074 E Cheltenham, 7750 S Muskegon) (2.0).

Claims Administration & Objections

JP 2.00 Work with team on legal and factual analysis of priority claims and articulate strategy for reviewing and assessing competing claims associated with properties encumbered by loan.

12/28/2020 MR

3.10 Begin review of claims relating to first tranche properties (.9); work with team on issues relating to same (2.2).

Claims Administration & Objections

12/29/2020 JRW

5.00 Telephone conference with A. Watychowicz regarding mortgagee listings and claims analysis (.1); study claims against property (3074 Cheltenham) and supporting documentation and prepare spreadsheet of results (3.2); confer with K. Duff, A. Porter, M. Rachlis and A. Watychowicz regarding procedures for analyzing claims (1.7).

Claims Administration & Objections

AW 2.50 Confer with K. Duff, M. Rachlis, J. Wine, A. Porter, and J. Porter regarding claims review (1.7); locate and review mortgagees' lists on property by property basis and email J. Wine regarding same (.3); finalize follow up letter to creditor and send via mail (.3); attention to filed objections to eleventh motion to approve sale, forward same to counsel, and follow up with K. Duff regarding order entered in relation to motion (7237 Bennett) (.2).

Claims Administration & Objections

AEP 1.70 Follow-up conference call with team to discuss methodology for reviewing claims, including legal and factual issues associated therewith.

Claims Administration & Objections

JP 1.70 Follow-up conference call with team to discuss methodology for reviewing claims, including legal and factual issues associated therewith.

Claims Administration & Objections

MR 3.20 Attention to claims related issues (.3); participate in meeting with K. Duff, J. Wine and A. Watychowicz regarding claims review (1.7); work on claims process outline issues (1.2).

Claims Administration & Objections

12/30/2020 JRW

JP

5.70 Review redlines and comments regarding proposed claims process outline (.5); conference call with claimants' counsel regarding same (1.8); prepare summary and exchange correspondence with K. Duff and M. Rachlis regarding same (.5); telephone conference with A. Watychowicz regarding process for claims verification and review (.3); review claims against property (7625 S East End) and update spreadsheet (1.9); related review of file for property (7625 S East End) (.5); confer with claimants' counsel regarding report to court regarding process (.1); exchange correspondence with K. Duff and A. Watychowicz regarding response to claimant inquiry (.1).

Claims Administration & Objections

 2.00 Prepare separate EBF mortgagee spreadsheets for all properties in receivership portfolio.

<u>Dat</u>	te Indi	liv Hours	<u>D</u>	escription
12/	/30/2020 N	MR 1.	.00	Attention to claims process issues and follow up emails on same to K. Duff and J. Wine.
				Claims Administration & Objections
12/	/31/2020 J	JRW 2.	.20	Prepare revised claims process outline with comments for further discussion.
				Claims Administration & Objections
	А	AW 0.	.50	Attention to email from claimant's spouse, response to same, update contact information, and request update to database (.3); attention to voicemail from claimant requesting update, review prior correspondence with claimant, and response to same (.2).
				Claims Administration & Objections
	M	/IR 0.	.30	Attention to email on claims process issues.
				Claims Administration & Objections
SUBTOTAL:	:			1[86.30 52805.50]
Tax Issues				
12/	/4/2020 K	(MP 1.	.70	Review and compile statements for Receiver's accounts for October and November for transmittal to tax administrator.
				Tax Issues
12/	/7/2020 K	(MP 2.	.50	Communications with tax administrator regarding request for bankstatements for 2020 (.2); review and compile statements for Receiver's property accounts for January-March in connection with same (2.3).
				Tax Issues
12/	/8/2020 K	(MP 4.	.00	Forward tax notices from federal agency to tax accountant (.2); forward forms 1099-S from recent property sales (7508 S Essex, 7201 S Dorchester) to tax account andtax administrator (.2); communications with tax administrator regarding request for bank statements for 2020 (.2);review and compile statements for Receiver's property accounts for April-August and November in connection with same (3.1); upload statements to tax administrator's portal (.3).
				Tax Issues
12/	/16/2020 A	AW 1.	.20	Research regarding EIN for entity as per K. Duff's request.
				Tax Issues

Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 165 of 182 PageID #:20434 Kevin B. Duff, Receiver Page 34

<u>Date</u>	Indiv Hours Description		
SUBTOTAL:		[ 9.40	1316.00]
		421.50	\$105,905.50

Other Charges			
	Description	_	
Business Operations			
	Software licenses (Google - \$96.00; InSynq - \$266.50)		362.50
	Online research for December 2020		308.32
	Photocopies for December 2020		9.10
SUBTOTAL:		[	679.92]
Total Other Charges			\$679.92

Summary of Activity

Cultur	ary or riouvity
	Hours Rate
Jodi Wine	109.70 260.00 \$28,522.00
Ania Watychowicz	37.60 140.00 \$5,264.00
Julia Porter	5.70 95.00 \$541.50
Justyna Rak	98.00 140.00 \$13,720.00
Kathleen M. Pritchard	34.10 140.00 \$4,774.00
Stoja Zjalic	0.40 110.00 \$44.00
Andrew E. Porter	54.20 390.00 \$21,138.00
Ellen Duff	12.70 390.00 \$4,953.00
Michael Rachlis	69.10 390.00 \$26,949.00

### **SUMMARY**

TOTAL DUE	<del></del>
Other Charges	\$679.92
Legal Services	\$105,905.50

Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 168 of 182 PageID #:20437

# **EXHIBIT H**

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.208409

Date 12/29/2020 Client No.BW10753

Services rendered in the month of October, 2020 per attached detail.

		•	
B. Fish	3.25 hours @ \$110		\$ 357.50
G. Castaldi	6.25 hours @ \$110		687.50
D. Arce	2.75 hours @ \$ 68		187.00
D. Weinberg	3.20 hours @ \$275		 880.00
		Current Amount Due	\$ 2,112.00

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

## Case: 1:18-cv-05587, Decay: 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 1000 | 10

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001	10/21/2020	Arce	ACCTG	CWU	4200	Conversation with Ellen	0.25	17.00	0.00
001	10/27/2020	Arce	ACCTG	CWU	4200	Duff re: Equitybuild project Conference call with Ellen	1.50	102.00	0.00
001	10/27/2020	Arce	ACCTG	CWU	4200	Duff, GC and Justyna Rak Preparing reports for Ellen Duff.	0.75	51.00	0.00
001	10/30/2020	Arce	ACCTG	CWU	4200	Creating and sending property report to Ellen Duff.	0.25	17.00	0.00
001	10/21/2020	Castaldi	TAX	1065	2100	13 Partnership Returns	1.25	137.50	0.00
001	10/20/2020	Castaldi	TAX	1065	2100	2017 partnership returns	0.25	27.50	0.00
001	10/27/2020	Castaldi	ACCTG	CWU	4235	Phone call with Ellen Duff & looking and sorting through documentation.	3.00	330.00	0.00
001	10/30/2020	Castaldi	ACCTG	CWU	4235	Rolling forward prior months in order to begin working on June.	1.75	192.50	0.00
001	10/6/2020	Fish	ACCTG	CWU	4200	update schedule for sold properties	0.50	55.00	0.00
001	10/7/2020	Fish	ACCTG	CWU	4200	making adjustments to the May statements for receivership	0.50	55.00	0.00
001	10/7/2020	Fish	ACCTG	CWU	4200	completed summary reports for Restoration and Reimbursment Owed as of 5-31-2020	1.50	165.00	0.00
001	10/9/2020	Fish	ACCTG	CWU	4200	create schedule for sold properties as of 5/31/20 for recievership	0.75	82.50	0.00
001	10/22/2020	Weinberg	TAX	1065	2130	Wording for 2017 Partnership returns	0.40	110.00	0.00
001	10/29/2020	Weinberg	TAX	1065	2105	Review & Process 13 2017 Partnership returns	2.80	770.00	0.00
							15.45	2,112.00	0.00
						Invoice Reconciliation			
						Billed WIP Adjusted Progress Amount		2,112.00 0.00 0.00	
						Gross Amount (Apply Prior Progress) Sales Tax (Sales Tax Applied)		2,112.00 0.00 0.00 0.00	
						Net Invoice		2,112.00	

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.208410

Date 12/30/2020 Client No.BW10753

Services rendered in the month of November, 2020 per attached detail.

B. Fish 1.00 hour @ \$110 \$ 110.00

G. Castaldi 23.75 hours @ \$110 2,612.50

D. Arce 26.50 hours @ \$ 68 \_\_\_\_\_1,802.00

Current Amount Due \$\_\_\_\_\_4,524.50

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

# Case: 1:18-cv-05587, DOC+1208401;#EQH578UFBARC REVENUE RANGE REVENUE RANGE REVENUE RANGE REVENUE RANGE RANGE

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	МЕМО	HOURS	BILLED	ADJUSTED
001	11/19/2020	Arce	ACCTG	CWU	4200	working on monthly reports.	1.00	68.00	0.00
001	11/25/2020	Arce	ACCTG	CWU	4200	Monthly Reports.	1.00	68.00	0.00
001	11/24/2020	Arce	ACCTG	CWU	4200	Monthly reports	4.00	272.00	0.00
001	11/10/2020	Arce	ACCTG	CWU	4200	Equitybuild reports	0.75	51.00	0.00
001	11/11/2020	Arce	ACCTG	CWU	4200	Reports	2.00	136.00	0.00
001	11/13/2020	Arce	ACCTG	CWU	4200	Monthly reports	4.75	323.00	0.00
001	11/14/2020	Arce	ACCTG	CWU	4200	Monthly reports	2.00	136.00	0.00
001	11/30/2020	Arce	ACCTG	CWU	4200	Monthly reports	2.00	136.00	0.00
001	11/3/2020	Arce	ACCTG	CWU	4200	Reports	4.00	272.00	0.00
001	11/5/2020	Arce	ACCTG	CWU	4200	Working on June Reports	3.00	204.00	0.00
001	11/6/2020	Arce	ACCTG	CWU	4200	Working on reports.	2.00	136.00	0.00
001	11/24/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	1.50	165.00	0.00
001	11/25/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	0.50	55.00	0.00
001	11/12/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	3.75	412.50	0.00
001	11/10/2020	Castaldi	ACCTG	CWU	4235	June Property statements	1.25	137.50	0.00
001	11/13/2020	Castaldi	ACCTG	CWU	4235	June Property statements	1.00	110.00	0.00
001	11/30/2020	Castaldi	ACCTG	CWU	4235	August Property	0.50	55.00	0.00
						Statements			
001	11/6/2020	Castaldi	CONSU	AUP	3570	June Property Statements	4.00	440.00	0.00
001	11/2/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	1.25	137.50	0.00
001	11/5/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	3.50	385.00	0.00
001	11/16/2020	Castaldi	ACCTG	CWU	4235	July Property statements	1.00	110.00	0.00
001	11/17/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	2.50	275.00	0.00
001	11/18/2020	Castaldi	ACCTG	CWU	4235	July property statements	3.00	330.00	0.00
001	11/11/2020	Fish	ACCTG	CWU	4200	enter insurance charges for June, July and Aug schedules.	1.00	110.00	0.00
							51.25	4,524.50	0.00
							31.23	4,324.30	0.00
						Invoice Reconciliation			
						Billed WIP		4,524.50	
						Adjusted		0.00	
						Progress Amount		0.00	
						Flogress Amount		0.00	
						Gross Amount		4,524.50	
						(Apply Prior Progress)		0.00	
						Sales Tax			
								0.00	
						(Sales Tax Applied)		0.00	
						Net Invoice		4,524.50	

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.208411

Date 12/31/2020 Client No.BW10753

Services rendered in the month of December, 2020 per attached detail.

G. Castaldi 27.75 hours @ \$110 \$ 3,052.50

D. Arce 9.50 hours @ \$ 68 \_\_\_\_\_646.00

Current Amount Due \$ 3,698.50

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

## Case: 1:18-cv-05587, Decayoration #: 20443

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001	12/10/2020	Arce	ACCTG	CWU	4200	bookkeeping	3.50	238.00	0.00
001	12/11/2020	Arce	ACCTG	CWU	4200	Monthly reports	0.25	17.00	0.00
001	12/4/2020	Arce	ACCTG	CWU	4200	Bookkeeping	2.00	136.00	0.00
001	12/8/2020	Arce	ACCTG	CWU	4200	Monthly reports	3.00	204.00	0.00
001	12/16/2020	Arce	ACCTG	CWU	4200	Bookkeeping	0.75	51.00	0.00
001	12/21/2020	Castaldi	ACCTG	CWU	4235	September property	0.73	55.00	0.00
001	12/2 1/2020	Oastalui	A0010	OVVO	4200	statements	0.50	33.00	0.00
001	12/14/2020	Castaldi	ACCTG	CWU	4235	September property	3.50	385.00	0.00
						statements			
001	12/15/2020	Castaldi	ACCTG	CWU	4235	September Property	3.50	385.00	0.00
	1011010000			014#1		Statements			
001	12/16/2020	Castaldi	ACCTG	CWU	4235	September Property	3.50	385.00	0.00
004	40/47/0000	0	10070	014/11	4005	Statements	4 75	400 50	0.00
001	12/17/2020	Castaldi	ACCTG	CWU	4235	September Property	1.75	192.50	0.00
004	40/00/0000	0	10070	014/11	4005	Statements	4.00	440.00	0.00
001	12/28/2020	Castaldi	ACCTG	CWU	4235	September Property	4.00	440.00	0.00
004	40/00/0000	0 4 - 1 -11	A 0.0T.0	0)4/1.1	4005	statements	4.50	405.00	0.00
001	12/22/2020	Castaldi	ACCTG	CWU	4235	September Property	1.50	165.00	0.00
004	40/4/0000	O = = 4 = 1 = 1:	ACCTO	CVA/LI	4005	Statements	4.00	440.00	0.00
001	12/1/2020	Castaldi	ACCTG	CWU	4235	August property statements	4.00	440.00	0.00
001	12/4/2020	Contoldi	ACCTC	CVVIII	400E		2.00	220.00	0.00
001	12/4/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	2.00	220.00	0.00
001	12/18/2020	Castaldi	ACCTG	CWU	4235	September Property	3.50	385.00	0.00
001	12/10/2020	Castalui	ACCIG	CVVO	4233	Statements	3.30	365.00	0.00
						Statements			
							37.25	3,698.50	0.00
						Invoice Reconciliation			
						Dill - 4 M/ID		0.000.50	
						Billed WIP		3,698.50	
						Adjusted		0.00 0.00	
						Progress Amount		0.00	
						Gross Amount		3,698.50	
						(Apply Prior Progress)		0.00	
						Sales Tax		0.00	
						(Sales Tax Applied)		0.00	
						(Calco Tax Applica)			
						Net Invoice		3,698.50	

Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 175 of 182 PageID #:20444

# **EXHIBIT I**

### Case: 1:18-cv-05587 Document #: 945-1 Filed: 02/23/21 Page 176 of 182 PageID #:20445



4123 Lankershim Boulevard North Hollywood, CA 91602

Kevin B. Duff Receiver for EquityBuild Inc Rachlis Duff Adler Peel & Kaplan LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Invoice: 537022 SEC E.A. reference:

ID: 3077400 SEC/DC Case Number: 1:18-cv-05587

Date: 12/31/2020 Responsible Party for Payment:

Due Date: 12/31/2020 Tax Administrator Appointment Date:

For professional services	rendered as follows:		SEC		
<u>DATE</u>	<u>SERVICE</u>	STAFF	DISCOUNT RATE	HOURS	<u>AMOUNT</u>
General Consulting S	ervices - General Consulting				
07/10/2020	General Bookkeeping	CA	56.000	1.00	56.00
	Processing all Bank Statements for client.				
Information Return Re	eporting Services - Information Return Reporting	l			
02/28/2020	Clear Review Notes	ER	160.000	0.25	40.00
	1099 correction.				
Qualified Settlement F	Fund Services - Estimated Taxes				
07/05/2020	Preparation	JGM	212.000	0.20	42.40
	Quarterly estimated tax payments 2020 Q1.				
07/08/2020	Preparation	JGM	212.000	0.90	190.80
	Quarterly estimated tax payments 2020 Q1.				
07/10/2020	Preparation	JGM	212.000	0.20	42.40
	Quarterly estimated tax payments 2020 Q1.				
09/11/2020	Preparation	JGM	212.000	0.20	42.40
	Quarterly estimated tax payments 2020 Q3.				
12/06/2020	Preparation	JGM	216.000	0.40	86.40
	Quarterly estimated tax payments 2020 Q4.				
	Fund Services - Tax Return				
06/29/2020	Preparation	JAC	168.000	0.25	42.00
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
07/08/2020	Preparation	JGM	212.000	0.70	148.40
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
07/10/2020	Preparation	JGM	212.000	0.30	63.60
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
07/10/2020	Review	ER	160.000	0.10	16.00

Miller Kaplan Arase LLP Page 2 of 2

					1 ago 2 oi
	Extension efile.				
10/09/2020	Preparation	JGM	212.000	5.50	1,166.00
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/10/2020	Preparation	JGM	212.000	6.50	1,378.00
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/11/2020	Preparation	JGM	212.000	5.40	1,144.80
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/12/2020	Final Review	JD	440.000	1.00	440.00
10/12/2020	Assemble	NAN	64.000	0.25	16.00
	Assemble 2019 1120SF				
12/08/2020	Preparation	JAC	180.000	1.10	198.00
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.				
Qualified Settlement	Fund Services - Tax Return				
03/23/2020	Review	ER	160.000	0.10	16.00
	Vendor 1099 correction - file with IRS.				
07/10/2020	Preparation	JAC	168.000	0.85	142.80
	Preparation of 2019 tax returns.				
07/27/2020	Preparation	JAC	168.000	0.20	33.60
	Preparation of the 2019 Qualified Settlement Fund Income Tax Return. Request Forms 1099-S from receiver and reach out re: approach to property sales.				
10/10/2020	Preparation	JAC	168.000	0.70	117.60
	Review of 2019 tax returns.				
12/07/2020	Preparation	JAC	180.000	1.00	180.00
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.				
		Total f	or Services		5,603.20
		Invoice	e Total		\$5,603.20

PLEASE REMIT PAYMENT VIA WIRE TRANSFER OR CHECK ACCORDING TO THE INSTRUCTIONS BELOW:
WIRE FUNDS TO:

CITY NATIONAL BANK
400 N. ROXBURY DRIVE, 5TH FLOOR
BEVERLY HILLS, CA 90210
ABA NUMBER 122016066 SWIFT CODE CINAUS6L
BENEFICIARY ACCOUNT NUMBER 113-238313
BENEFICIARY ACCOUNT NAME: MILLER KAPLAN ARASE LLP

MAKE CHECK PAYABLE TO:

MILLER KAPLAN ARASE LLP 4123 LANKERSHIM BLVD, NORTH HOLLYWOOD, CA 91602-2828

12/31/2020	11/30/2020	10/31/2020	09/30/2020	08/31/2020+	<u>Total</u>
5,603.20	0.00	0.00	0.00	4,391.60	\$9,994.80

# **EXHIBIT J**



Bill-to INVOICE
Mr. Kevin Duff 151002

Attn: Account Payable 542 S Dearborn Street

Suite 900

CHICAGO, IL 60605.

Transaction	151002	Line Total	120.00
Invoice Date	2/10/21	Sales Tax	0.00
Legal Entity	Axos Bank	Shipping	0.00
		Total	120.00
		Payments	0.00
		Credits	0.00

**Financial Charges** 

Line Total

0.00

120.00

Payment	Terms	IMMEDIATE	Due Date	2/10/21			Baland	e Due \$120.0	0
No. Pro	oduct	Description			UOM	Quantity	Unit Price	Amour	nt
1		Clerical/Administrative S	Support		Each	2	35.00	70.0	0
2		Monthly Claims Extracti	on		Each	.5	100.00	50.0	10

### Remit to

Axos Bank

Attn: Accounts Receivable

7300 College Blvd.

Suite 450

Overland Park, KANSAS 66210.

#### **Comments**

Employee	Date	Time	Description: Data Entry
Joanna	10/16/2020	0.5	Data Entry: Enter new claims for Skurski Trust
Joanna	10/19/2020	0.25	Data Entry: Updated email, phone numbers. 3 claimants
Joanna	11/4/2020	0.5	Data Entry: Updated contact info on multiple claimants
Joanna	11/10/2020	0.5	Data Entry: Added documents to Jason Ragan claims
Joanna	11/20/2020	0.25	Data Entry: Updated 2 claims, name change and documents
Joanna total		2	
Employee	Date	Time	Description: Programming
Cheryl	10/4/2020	0.5	Program: Researching what client said was a missing claim
Cheryl total		0.5	
Employee	Date	Time	Description: Project Manager
Gena		0	
Gena total		0	

# **EXHIBIT K**



## Invoice

BILL TO			
EquityBuild Kevin Duff			

DATE	INVOICE#
1/14/2021	12327

TERMS	PROJECT

QUANTITY	SERVICED	DESCRIPTION	RATE	AMOUNT
1	10/5/2020	Put up a number of articles. 9 articles. On website.	110.00	110.00
0.25	10/6/2020	Posted 1 article and had to upload PDF manually because it was too big.	110.00	27.50
1	10/19/2020	Uploaded 7 items one of them was too big of a pdf had to manually do this.	110.00	110.00
1	10/27/2020	Uploaded 8 articles with attachments.	110.00	110.00
1	10/29/2020	Uploaded one article to EB section.	110.00	27.50
0.5	11/9/2020	Looked into website: app.propertyware.com to see if there is a viable way to download everything	110.00	55.00
		there easily. Tried several options and looked through the help section. Responded back to Kathy		
		about thoughts after investigating website closer.		
-	11/11/2020	Uploaded 23 EB documents and put in 23 article links. Tested it out.	110.00	165.00
1	11/18/2020	Fix text typo for EB website.	110.00	27.50
0.5	11/24/2020	Uploaded 3 articles pdf and adjust EB website.	110.00	55.00
1	12/7/2020	Updated several articles and PDF upload.	110.00	110.00
	12/9/2020	Uploaded 1 pdf and setup 1 article link for EB page.	110.00	27.50
1.5	12/31/2020	Edited website and Uploaded PDF's and put them in order.	110.00	165.00
		Illinois Sales Tax	10.25%	0.00

Thank you for your business.

Total

\$990.00